

Exhibit B to the Complaint

U.S. Patent No. 9,300,723 v. Wondershare Technology Group Co Ltd

Claims 22, 24, 27, 29, 30.

Exhibit B to the Complaint

1. Claim Chart

Claim	Analysis
<p>[22.P] A method of transferring a media file from a wireless mobile device to a media system over a communication network, the media system including a security measure.</p>	<p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the Company provides a MobileTrans App, a data transfer application installed on both Android phone and iPhone. The MobileTrans App utilizes a wireless internet connection ("communication network") that allows the iPhone ("wireless mobile device") to send files ("transferring a media file") to the Android phone ("media system").</p> <p>Furthermore, the Android phone and the iPhone do not require users to input the email and the password every time they communicate. Instead, the email and password input are necessary ("security measure") during the initial connection process, and thereafter, the devices automatically exchange data without requiring users to re-enter the email and password.</p>

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 MobileTrans App-WhatsApp & Phone

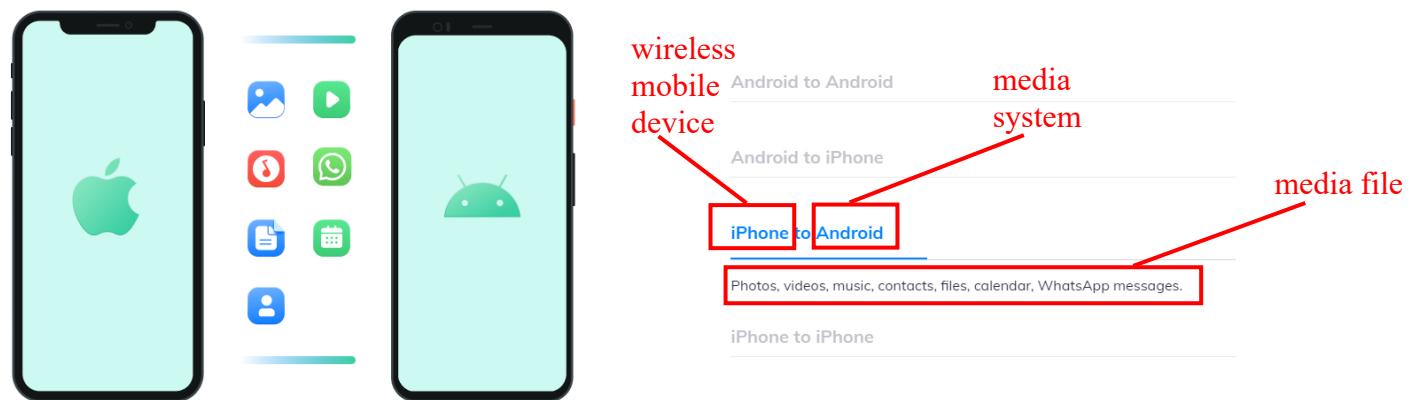
Best App for Phone Transfer & File Transfer

- Transfer up to 10 types of phone data between devices.
- Merge old and new WhatsApp data (Android to iOS). New
- Transfer large files between phone, PC, and tablet.
- No Cellular data usage & No cable is required.
- No one can access your personal data.

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Source: <https://mobiletrans.wondershare.com/app/phone-to-phone-transfer-app.html>



Source: <https://mobiletrans.wondershare.com/app/phone-to-phone-transfer-app.html> (annotated)

Exhibit B to the Complaint

 **File Transfer: Easily Transfer Multiple Files**

Share files from one device with any other. Effortlessly and wirelessly

Transfer files across different platforms without the Internet and allows file-sharing nearby and remotely.

Source: <https://mobiletrans.wondershare.com/app/phone-to-phone-transfer-app.html>



Source: <https://www.youtube.com/watch?v=WuBk-YjJlI4>, at 0:07

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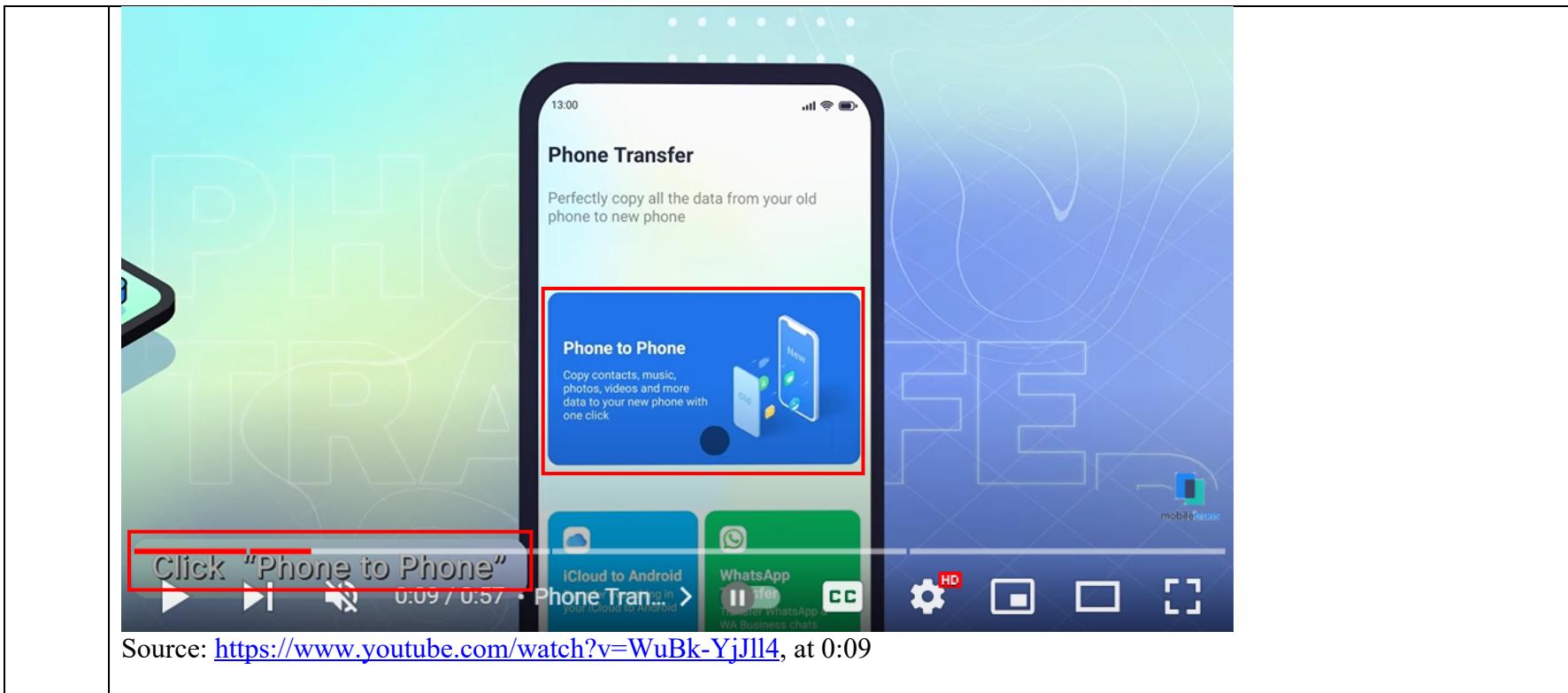


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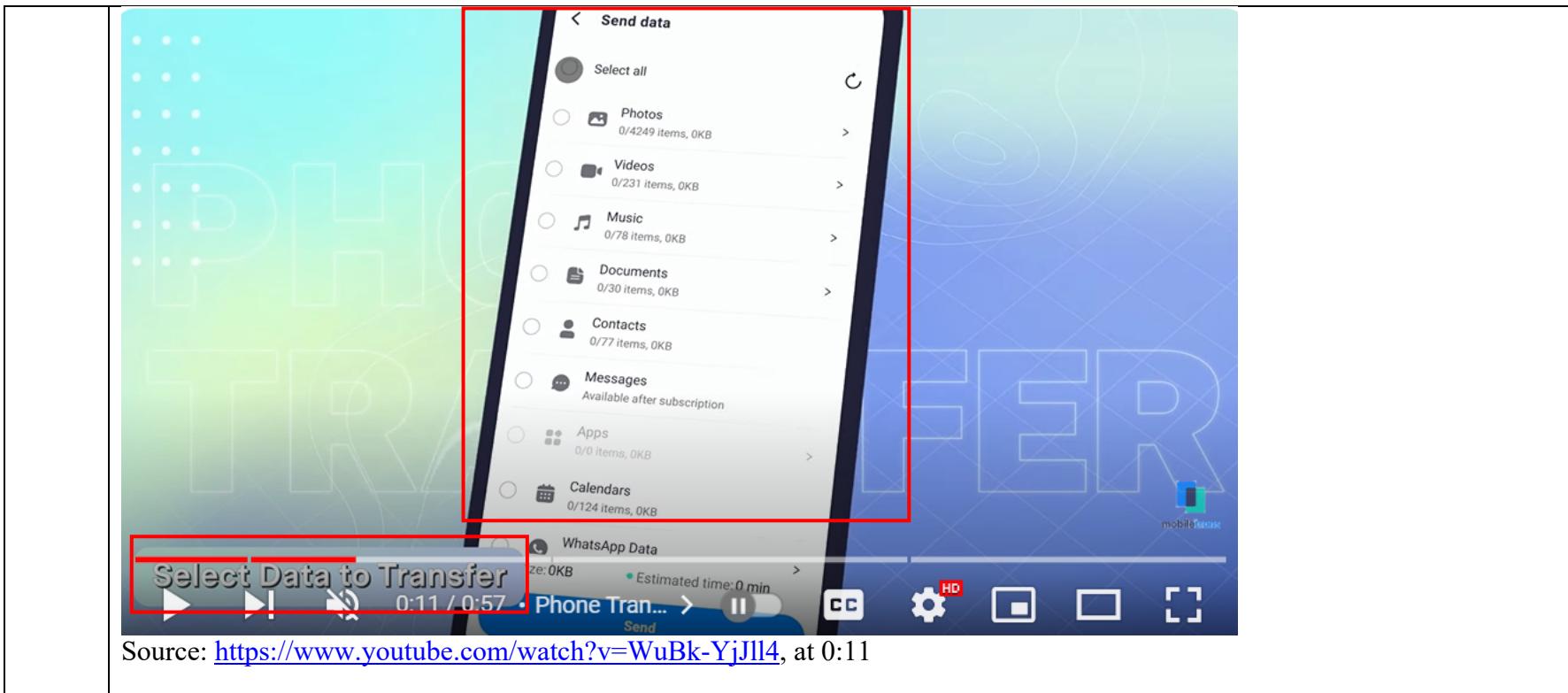


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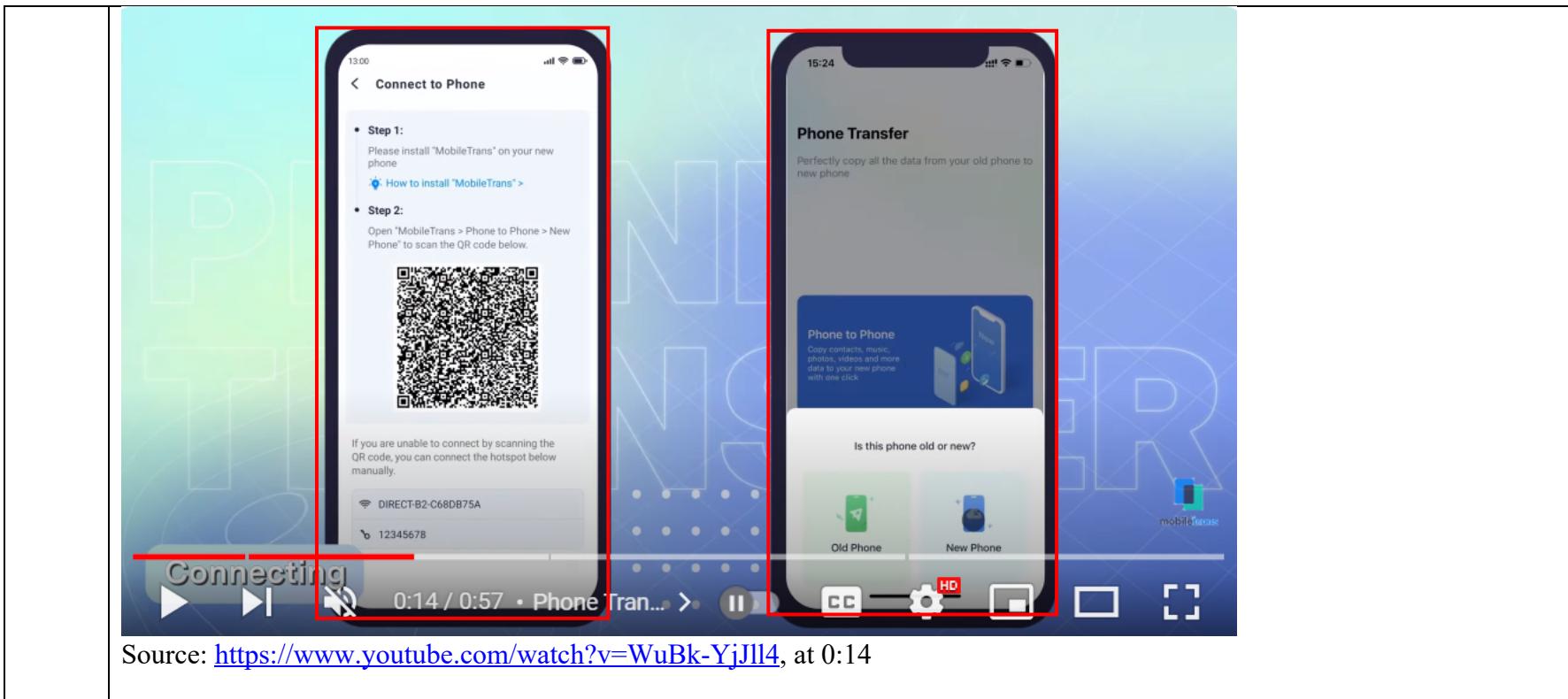
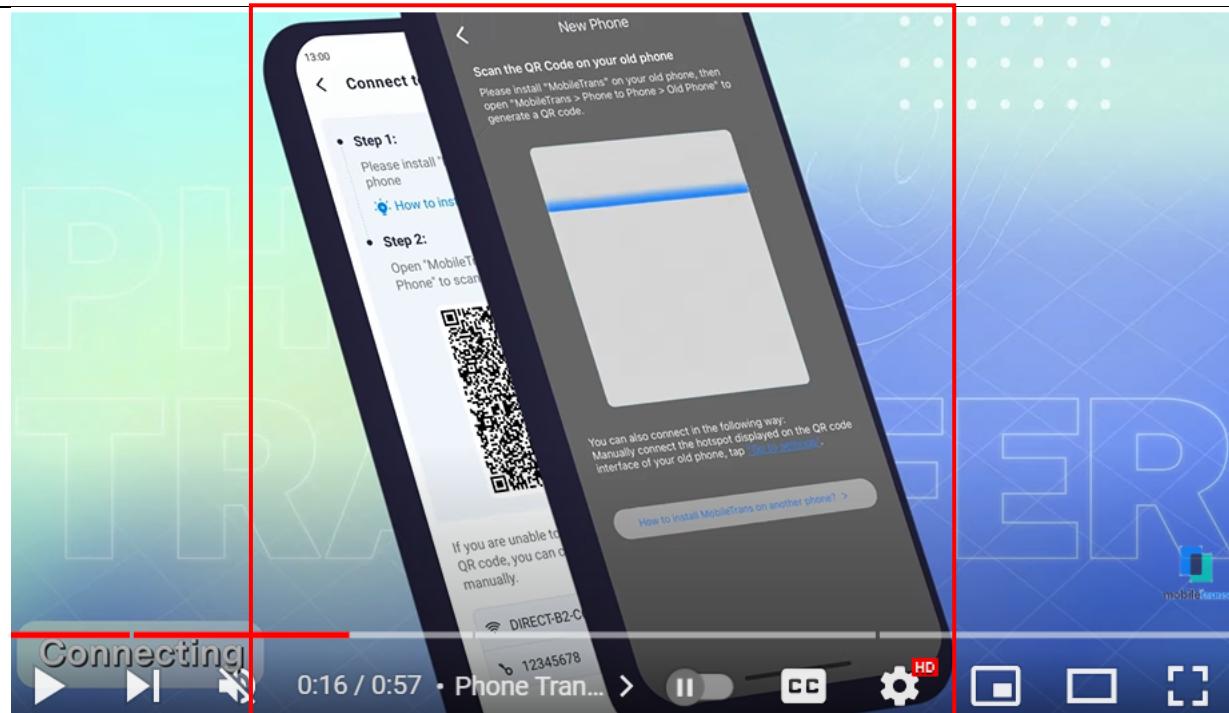


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Source: <https://www.youtube.com/watch?v=WuBk-YjJlI4>, at 0:16

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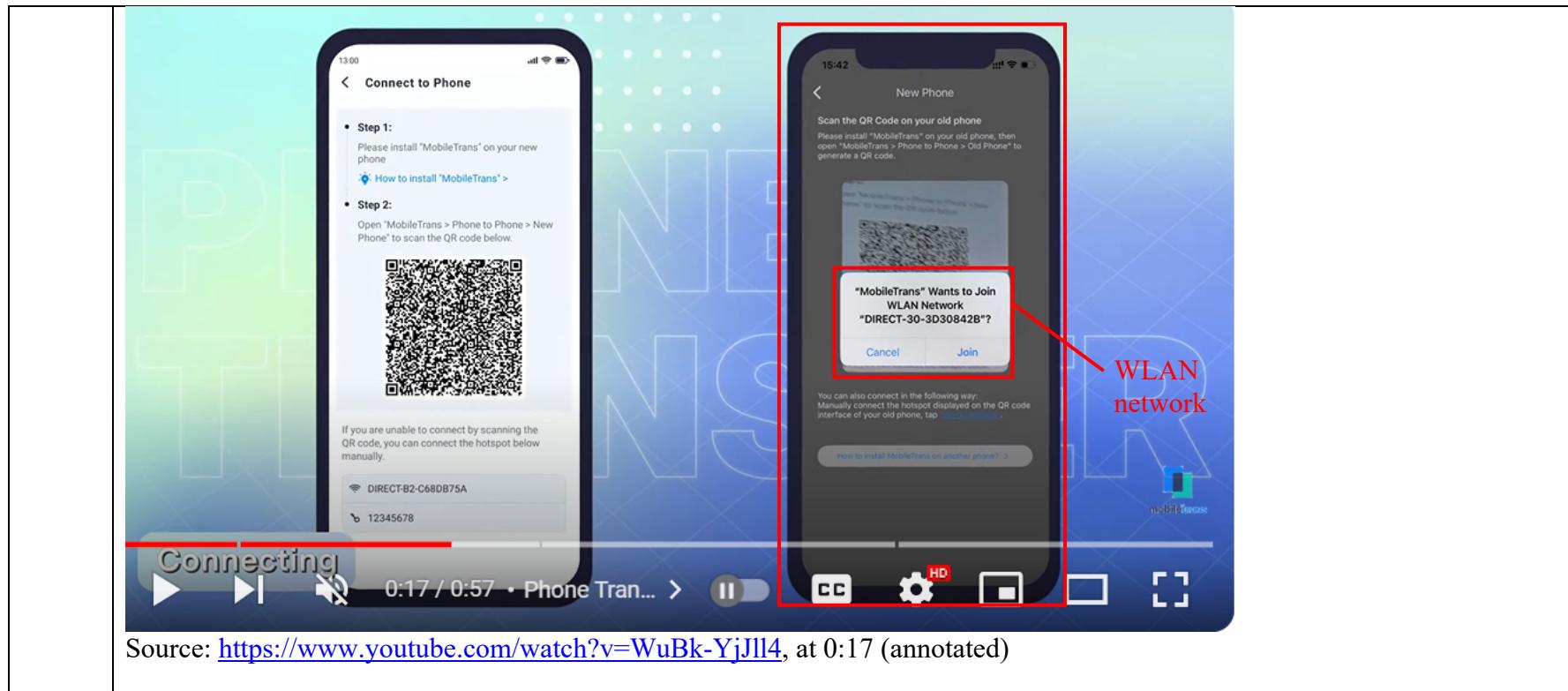


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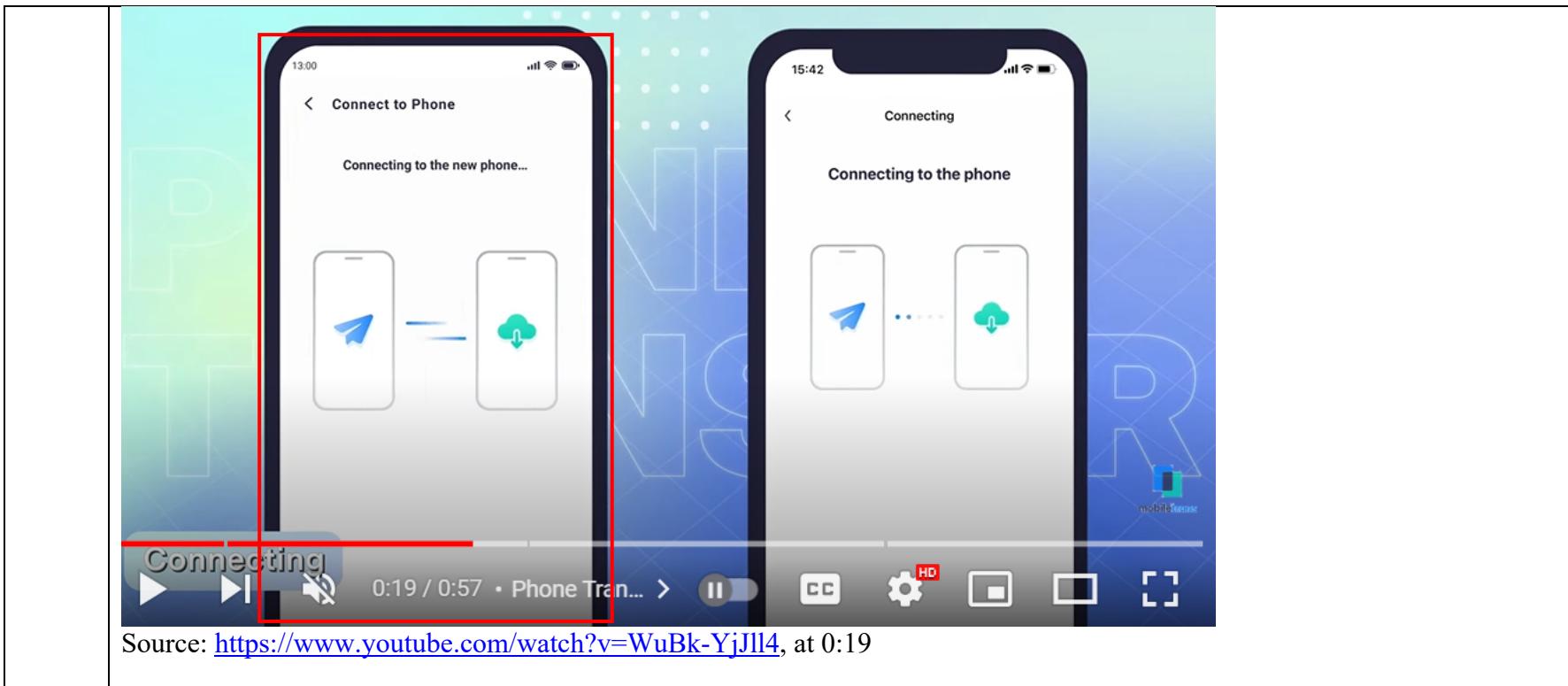


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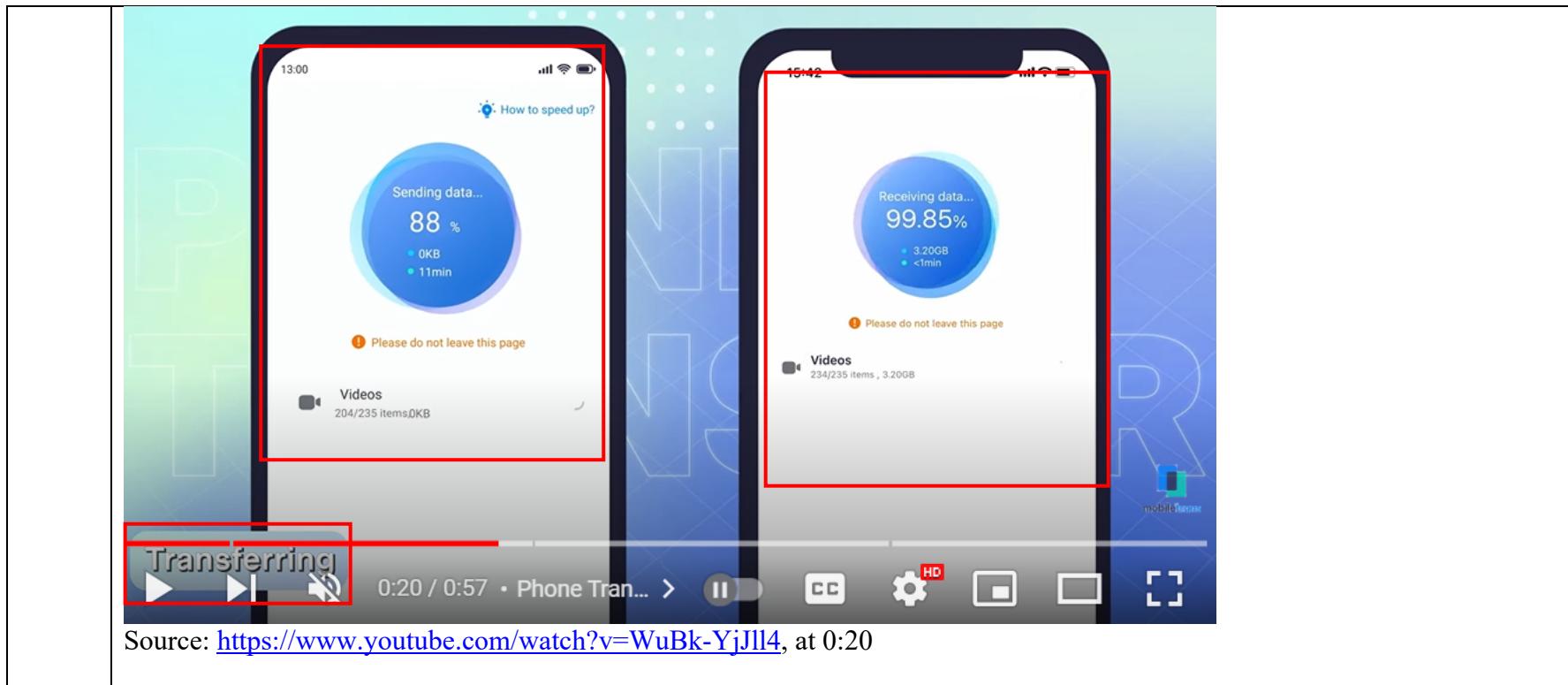


Exhibit B to the Complaint

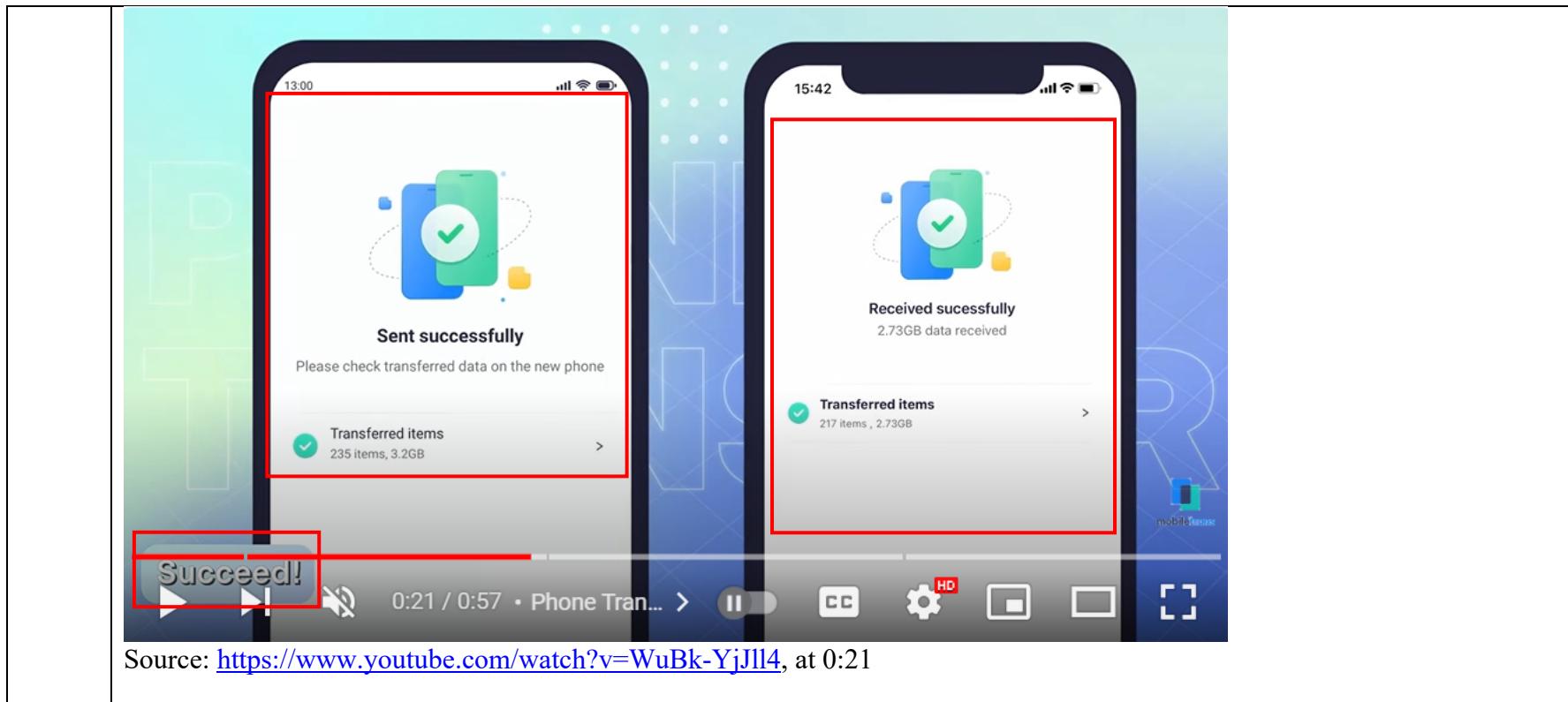


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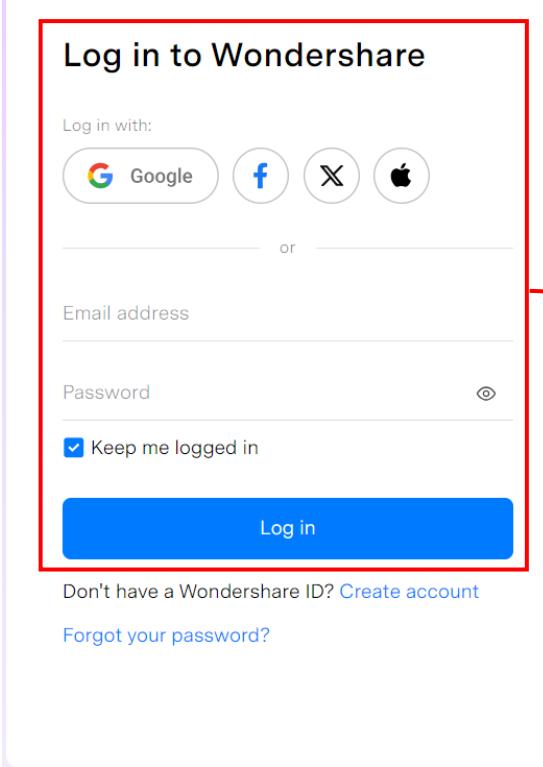
	 <p>media system security measure</p> <p>Source: https://accounts.wondershare.com/web/login-new?_gl=1%2a1p2a9bm%2a_gcl_au%2aMjAxMzkyNTU2NC4xNzAyODg0MDc3%2a_ga%2aMTEyMjM1MjAwNC4xNzAyODg0MDc5%2a_ga_24WTSJBD5B%2aMTcwMzgzMDY4My42LjAuMTcwMzgzMDY5MS41Mi4wLjA.&_ga=2.259574346.1909711405.1703824421-1122352004.1702884079 (annotated)</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
[22.1] disposing the media	Company performs and/or induces others to perform the step of disposing the media system in an accessible relation to at least one interactive computer network that has a wireless range structured to permit authorized access to said at least one interactive computer network, wherein the wireless mobile device within said wireless range, wherein said wireless mobile device is detectable by said media system.

Exhibit B to the Complaint

system in an access ible relatio n to at least one interac tive compu ter networ k that has a wirele ss range structu red to permit author ized access to said at least one interac tive compu ter networ k,	<p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the MobileTrans App is installed on both Android phone (“media system”) and iPhone (wireless mobile device). The phones utilize the file transfer feature to send/receive files via a WLAN connection (“interactive computer network”). The Android phone makes use of the WLAN connection for wirelessly transmitting files to the nearby (“wireless range”) iPhone. The Android phone needs to scan a QR code (“authorized access”) through the MobileTrans app to establish a connection with the nearby (“wireless range”) iPhone. After a successful scan, the Android phone transfers the files to the iPhone through the established WLAN connection. Additionally, if the user cannot connect through QR code scanning, the MobileTrans app offers a functionality where the Android phone can connect to a local wireless internet connection. To connect to a local wireless router, the user must input a username and password for authorized access. Since wireless routers have an inherent wireless range. Given that the WLAN connection has a defined range, and the Android phone establishes the WLAN connection while the iPhone connects to the established WLAN for receiving files. Therefore, it would be apparent to a person of ordinary skill in the art that the iPhone is disposed within said wireless range and it is detectable by the Android phone.</p> <p>Source: https://mobiletrans.wondershare.com/app/phone-to-phone-transfer-app.html (annotated)</p>
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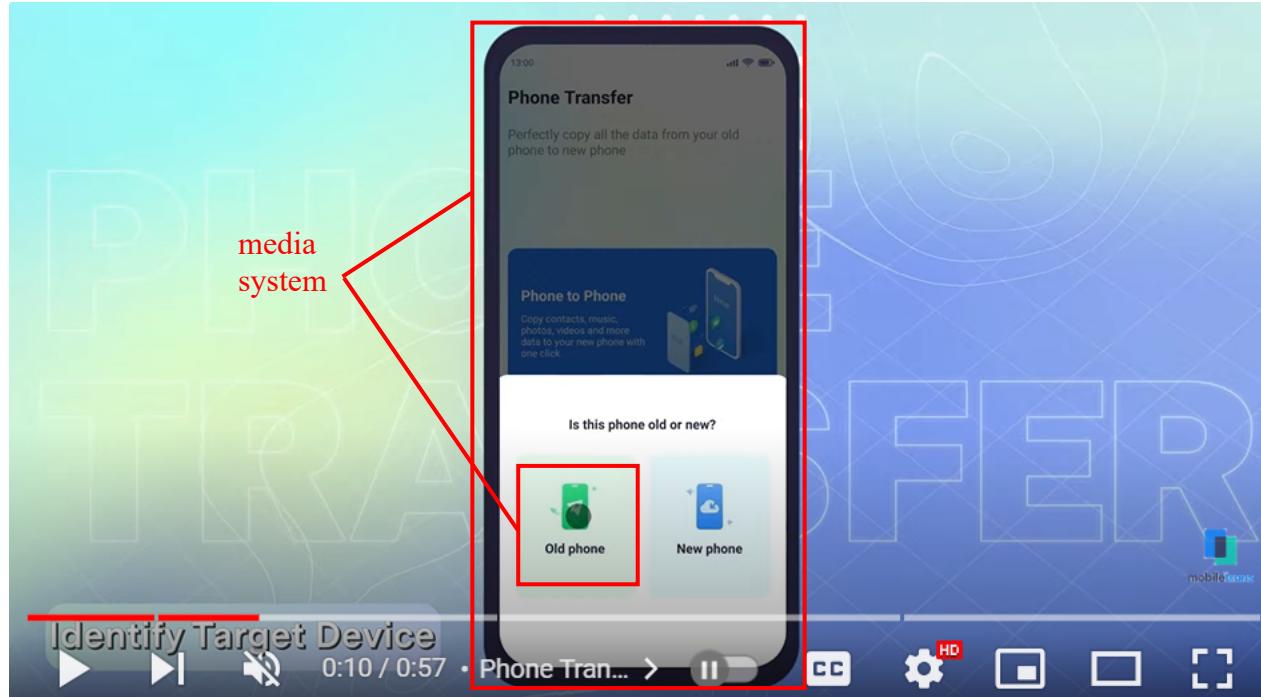
wherein the wireless mobile device within said wireless range, wherein said wireless mobile device is detectable by said media system ,	<p>File Transfer: Easily Transfer Multiple Files</p> <p>Share files from one device with any other. Effortlessly and wirelessly</p> <p>Transfer files across different platforms without the Internet and allows file-sharing nearby and remotely.</p> <p>Source: https://mobiletrans.wondershare.com/app/phone-to-phone-transfer-app.html</p>  <p>Source: https://www.youtube.com/watch?v=WuBk-YjJl4, at 0:10 (annotated)</p>
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Exhibit B to the Complaint



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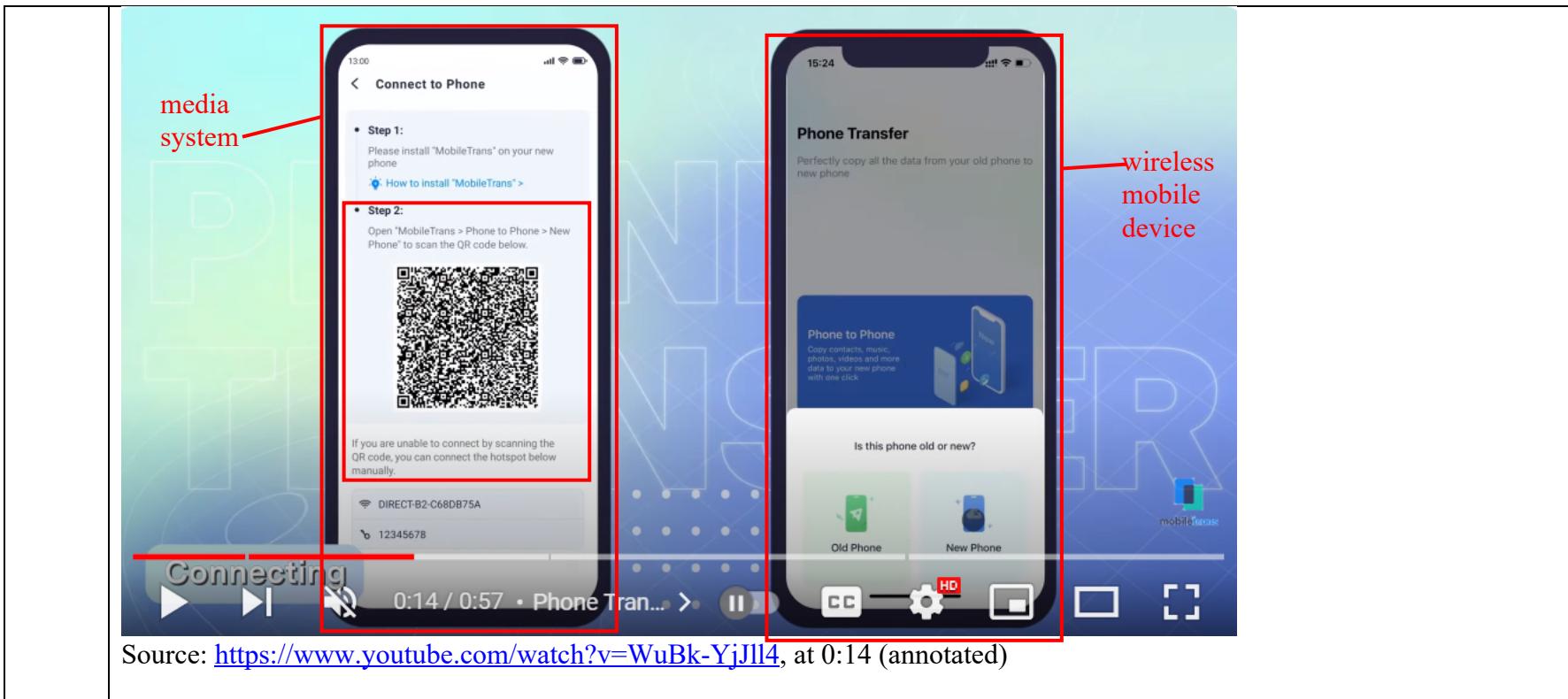


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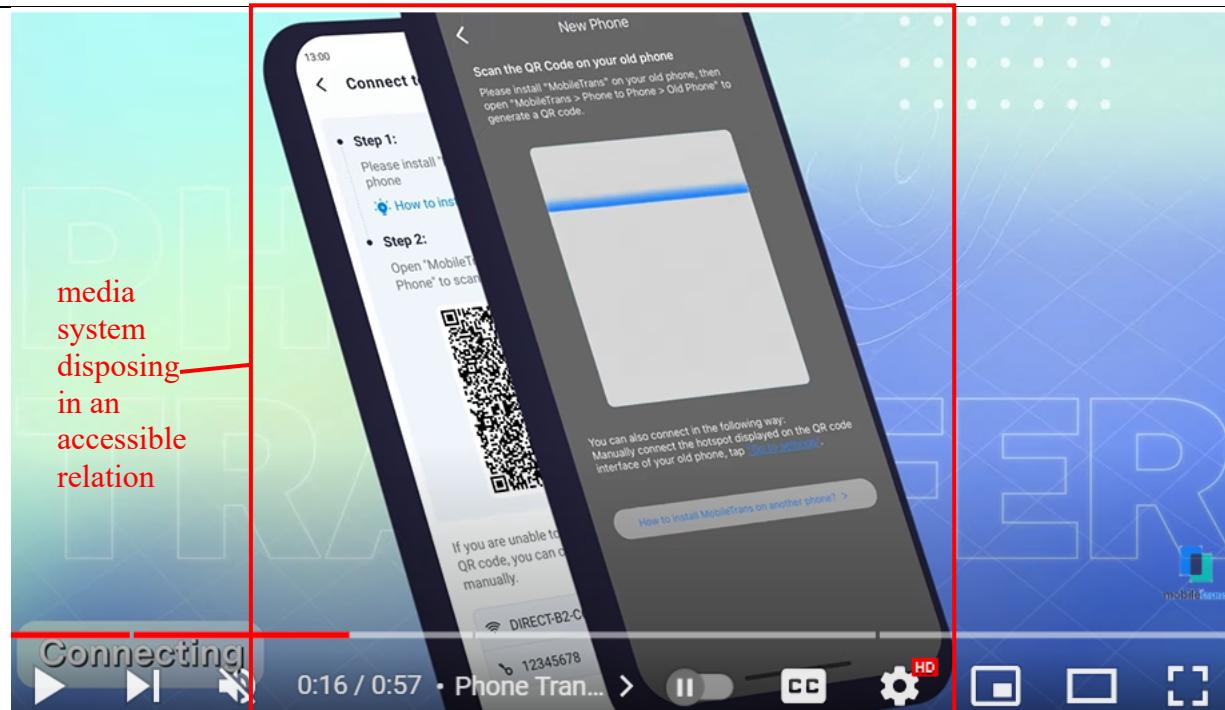


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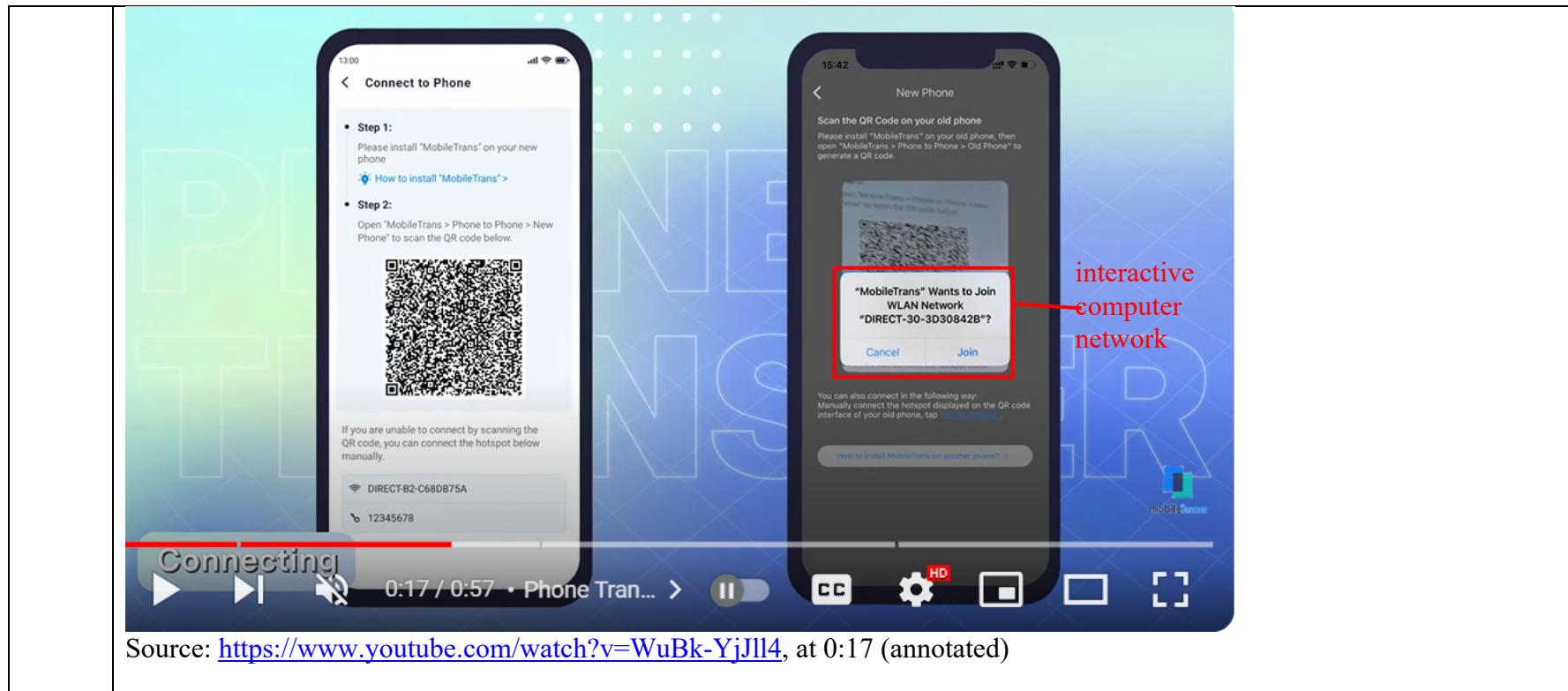


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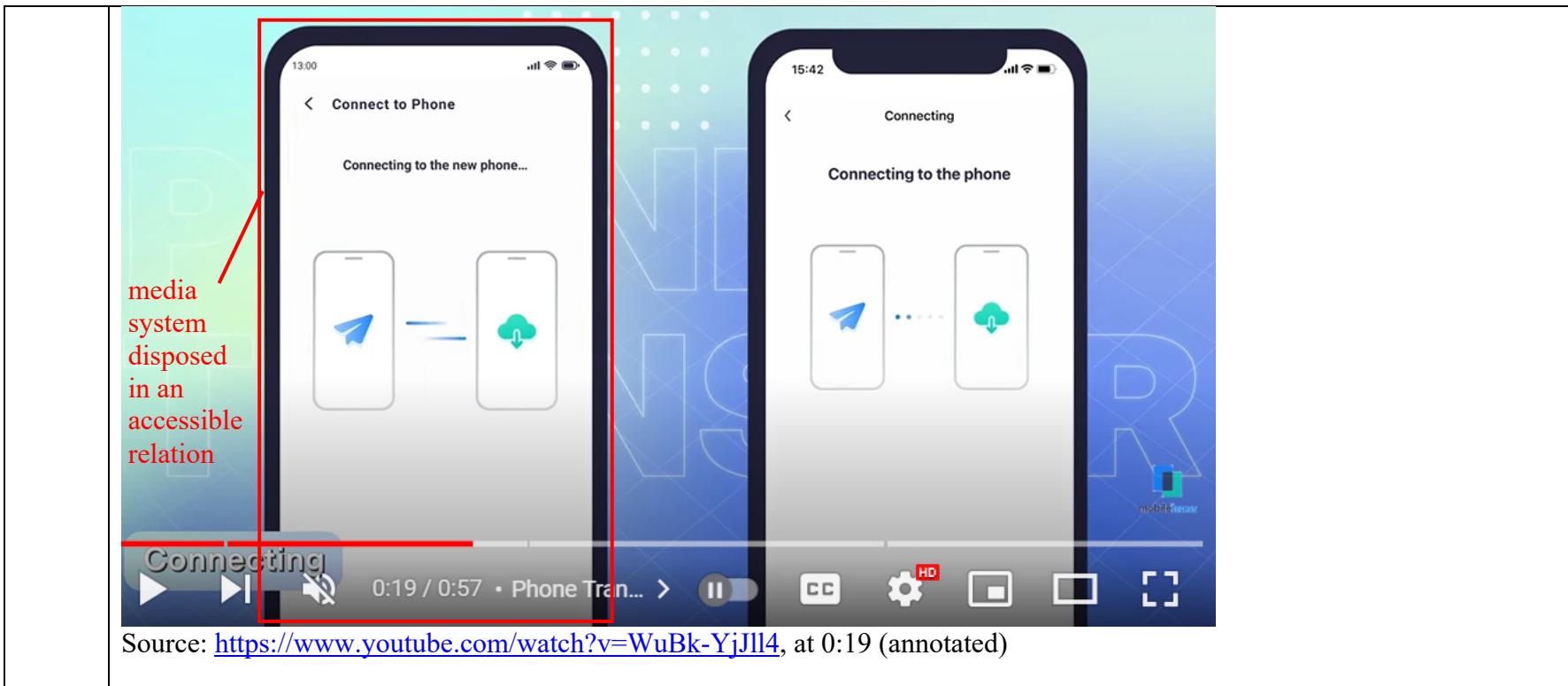


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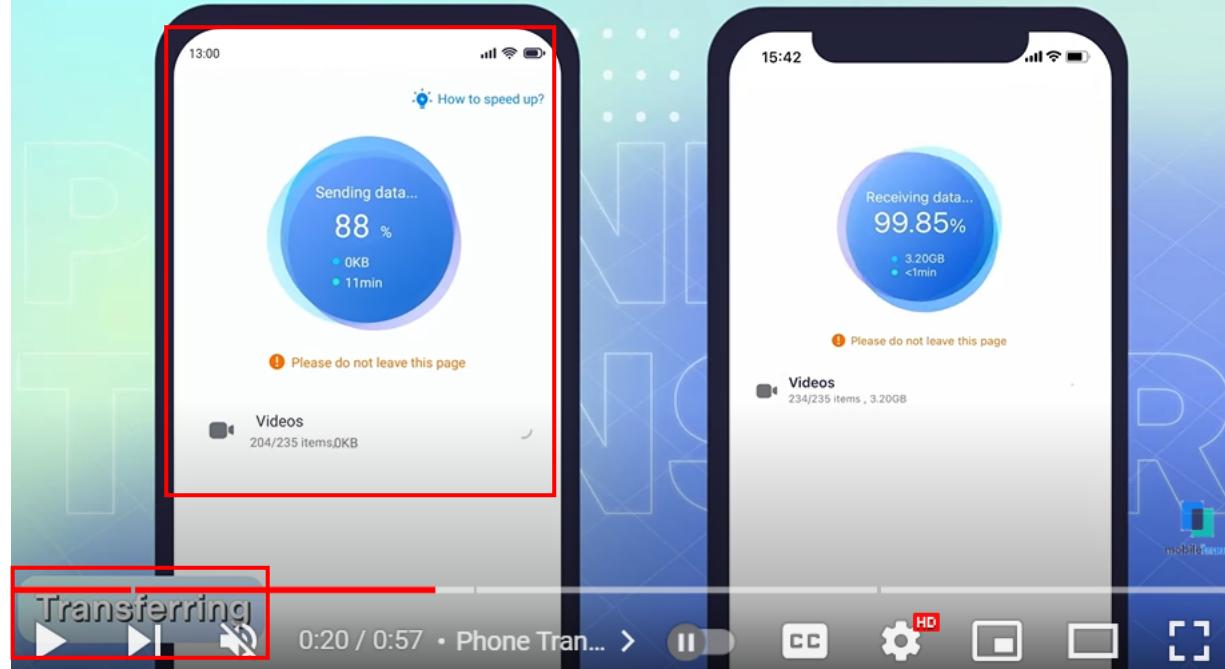
	 <p>Source: https://www.youtube.com/watch?v=WuBk-YjJlI4, at 0:20</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
[22.2] initially disposing at least one digital media	<p>Company performs and/or induces others to perform the step of initially disposing at least one digital media file on the wireless mobile device, said media system being structured to detect said wireless mobile device disposed within said wireless range.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the iPhone ("wireless mobile device") utilizes the WLAN connection for wirelessly sending ("initially disposing") the files ("digital media file") to the nearby ("wireless range") Android phone ("media system"). It would be apparent to a person of ordinary skill in the art that the Android phone ("media system") being structured to detect said wireless mobile device.</p>

Exhibit B to the Complaint

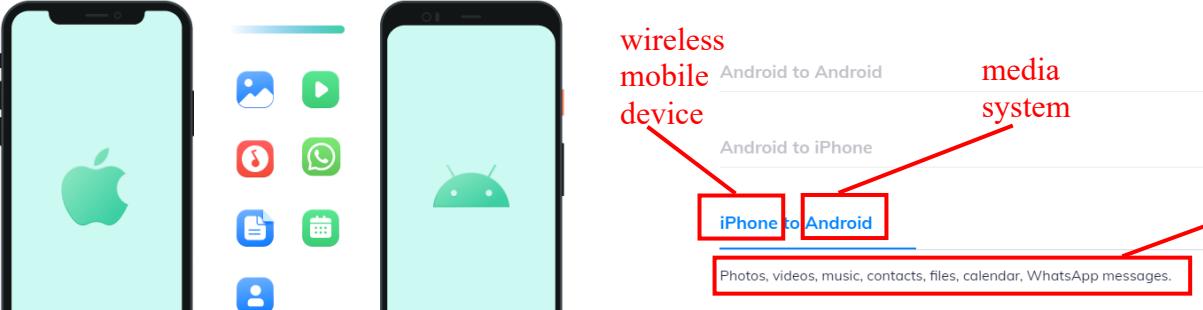
<p>file on the wireless mobile device , said media system being structured to detect said wireless mobile device disposed within said wireless range,</p>	 <p>Source: https://mobiletrans.wondershare.com/app/phone-to-phone-transfer-app.html (annotated)</p> <p>File Transfer: Easily Transfer Multiple Files</p> <p>Share files from one device with any other. Effortlessly and wirelessly</p> <p>Transfer files across different platforms without the Internet and allows file-sharing nearby and remotely.</p> <p>Source: https://mobiletrans.wondershare.com/app/phone-to-phone-transfer-app.html</p>
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Exhibit B to the Complaint



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	<p>Source: https://www.youtube.com/watch?v=WuBk-YjJlI4, at 0:14 (annotated)</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
[22.3] structuring a comm unicati on link to dispos	<p>Company performs and/or induces others to perform the step of structuring a communication link to dispose said media system and said wireless mobile device in a communicative relation with one another via said at least one interactive computer network.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the user initiates the login process to their Wondershare account using the Android phone ("media system"). This involves entering login credentials such as email and password. After the login process, the Android phone ("media system") displays the QR code, which is then scanned by the iPhone ("wireless mobile device") to establish a connection with the Android</p>

Exhibit B to the Complaint

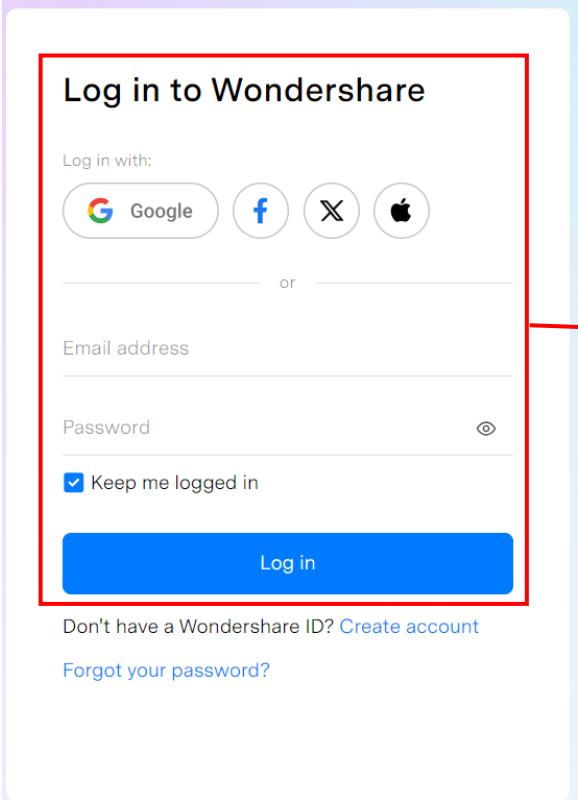
e said media system and said wireless mobile device in a communication relationship with one another via said at least one interactive computer network,	phone through a WLAN ("interactive computer network"). Consequently, this procedure establishes a communication channel ("structuring a communication link to dispose") between the Android phone and the iPhone.
	 <p>The screenshot shows the 'Log in to Wondershare' page. It features a red box around the central login form. To the right of the red box, a red arrow points to the text 'user login to Wondershare account'. The login form includes fields for 'Email address' and 'Password', a 'Keep me logged in' checkbox, and a blue 'Log in' button. Below the form, there are links for 'Create account' and 'Forgot your password?'. The source URL for this image is provided at the bottom of the exhibit.</p> <p>Source: https://accounts.wondershare.com/web/login-new?_gl=1%2a1p2a9bm%2a_gcl_au%2aMjAxMzkyNTU2NC4xNzAyODg0MDc3%2a_ga%2aMTEyMjM1MjAwNC4xNzAyODg0MDc5%2a_ga_24WTSJBD5B%2aMTcwMzgzMDY4My42LjAuMTcwMzgzMDY5MS41Mi4wLjA.&_ga=2.259574346.1909711405.1703824421-1122352004.1702884079 (annotated)</p>

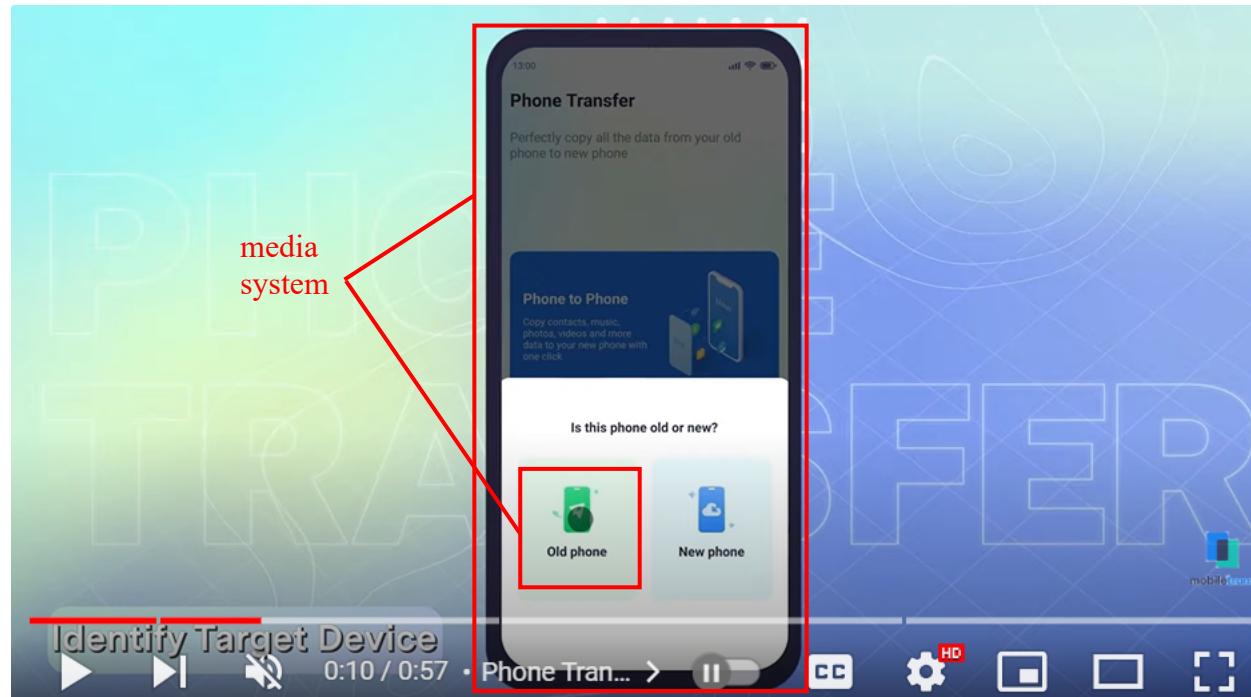
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 File Transfer: Easily Transfer Multiple Files

Share files from one device with any other. Effortlessly and wirelessly

Transfer files across different platforms without the Internet and allows file-sharing nearby and remotely.

Source: <https://mobiletrans.wondershare.com/app/phone-to-phone-transfer-app.html>



Source: <https://www.youtube.com/watch?v=WuBk-YjJl4>, at 0:10 (annotated)

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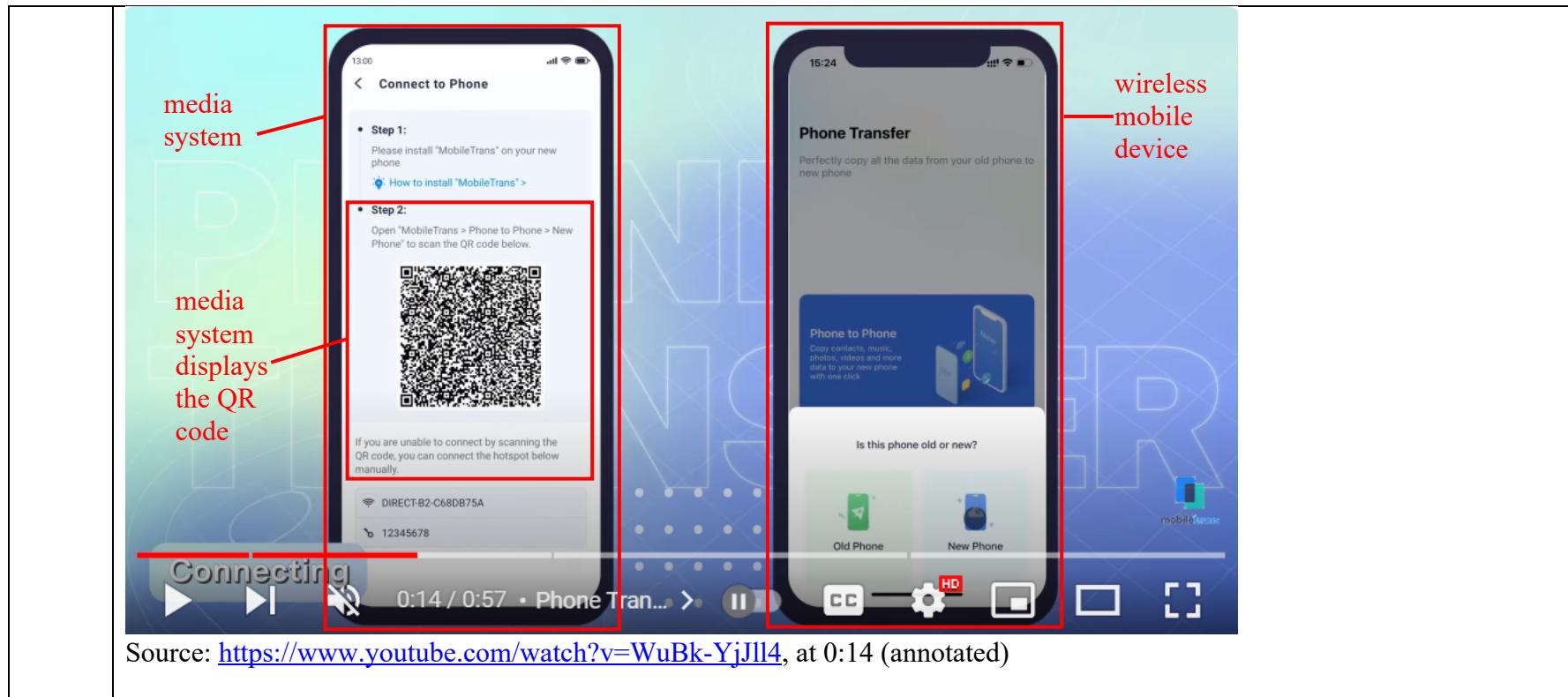


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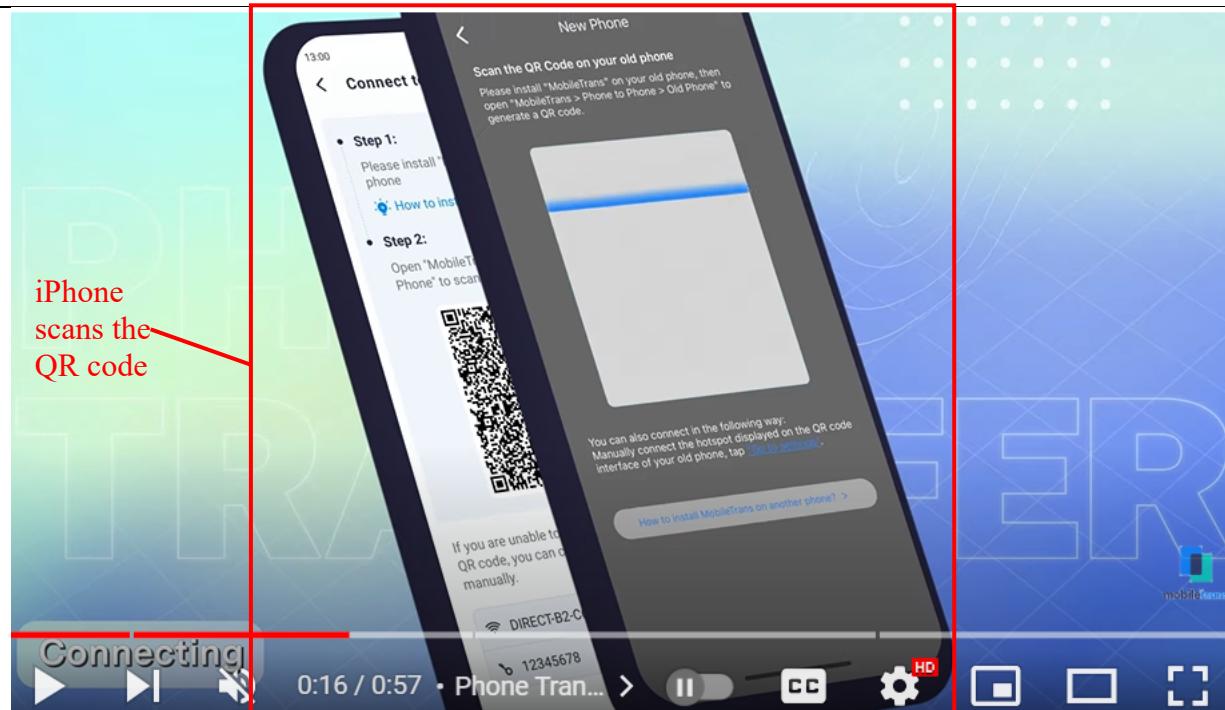


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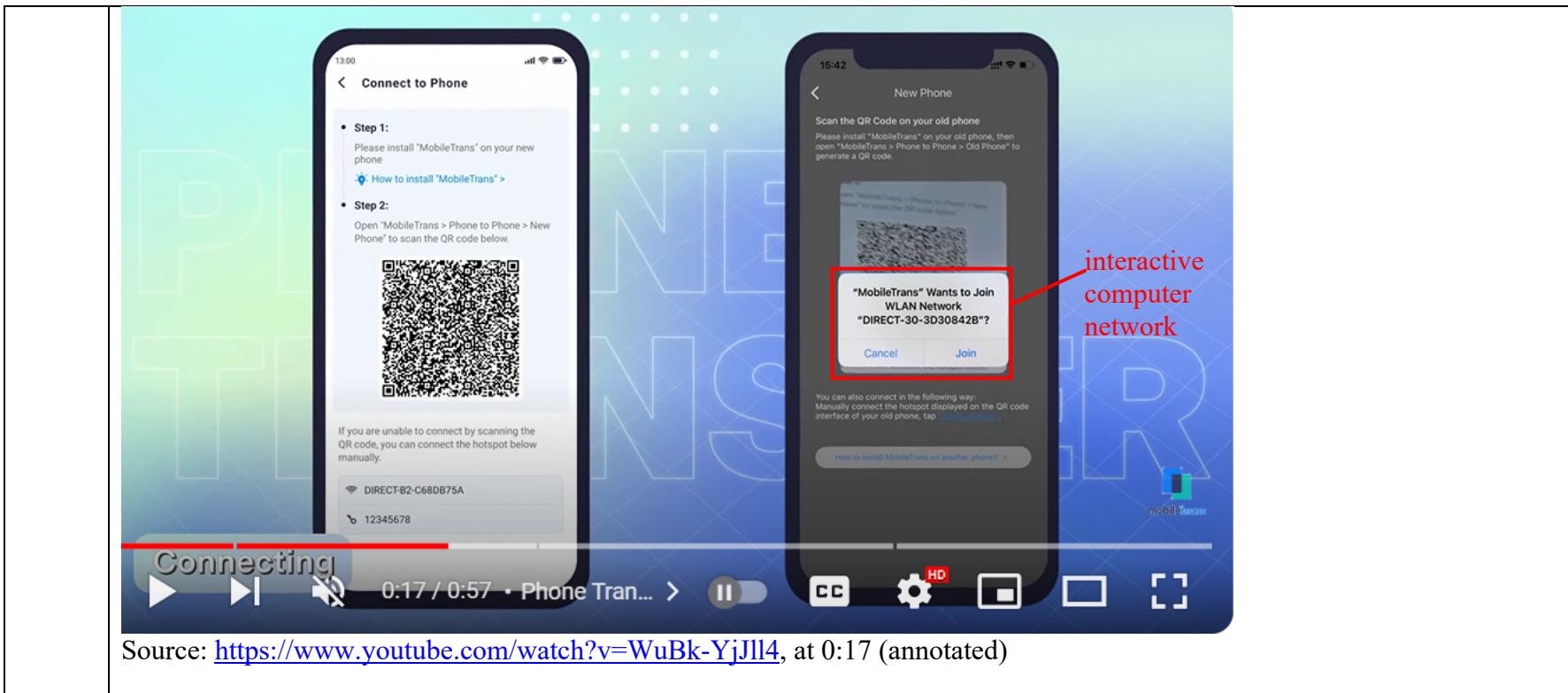


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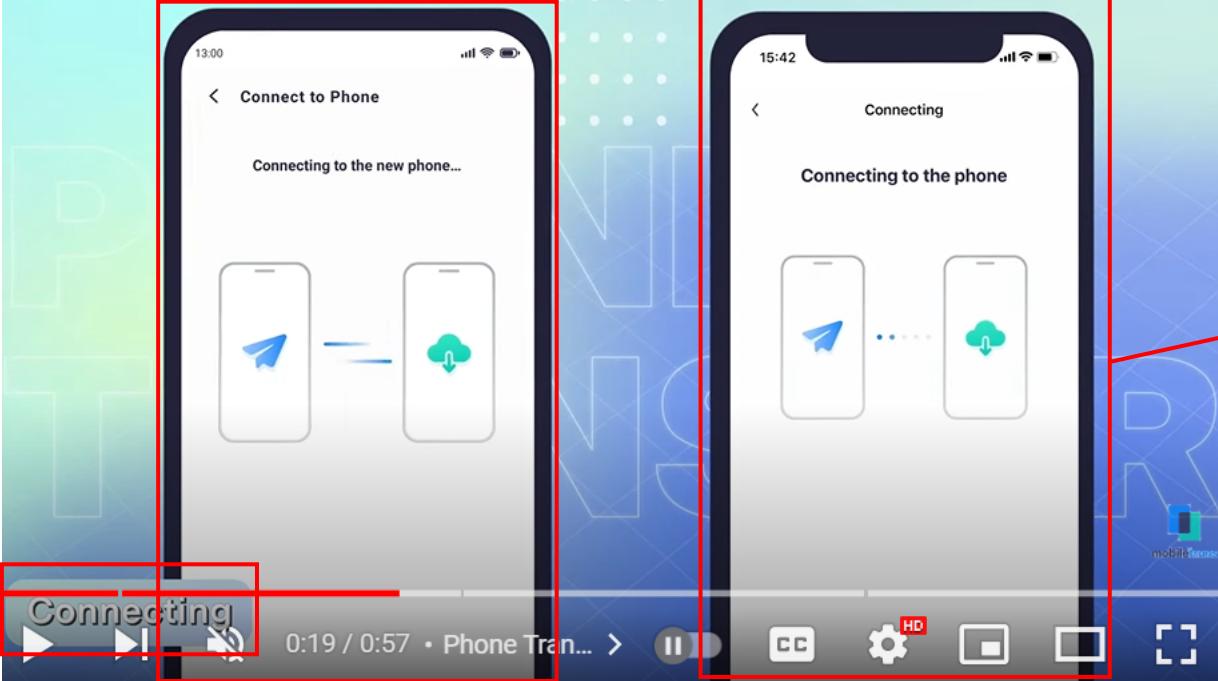
	 <p>Source: https://www.youtube.com/watch?v=WuBk-YjJlI4, at 0:19 (annotated)</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>	<p>communication link establishes between media system and wireless mobile device</p>
[22.4] initiating said communication link by said media	<p>Company performs and/or induces others to perform the step of initiating said communication link by said media system.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the user of Android phone ("media system") initiates login process by inputting the login credentials such as email and password. This process established the communication channel between the Android phone and the iPhone.</p>	

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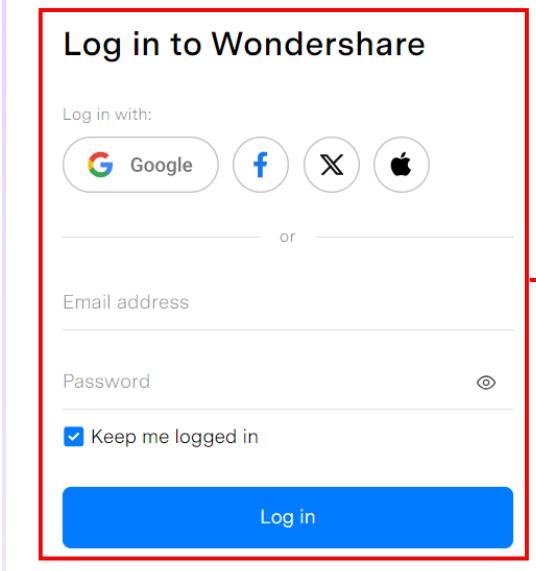
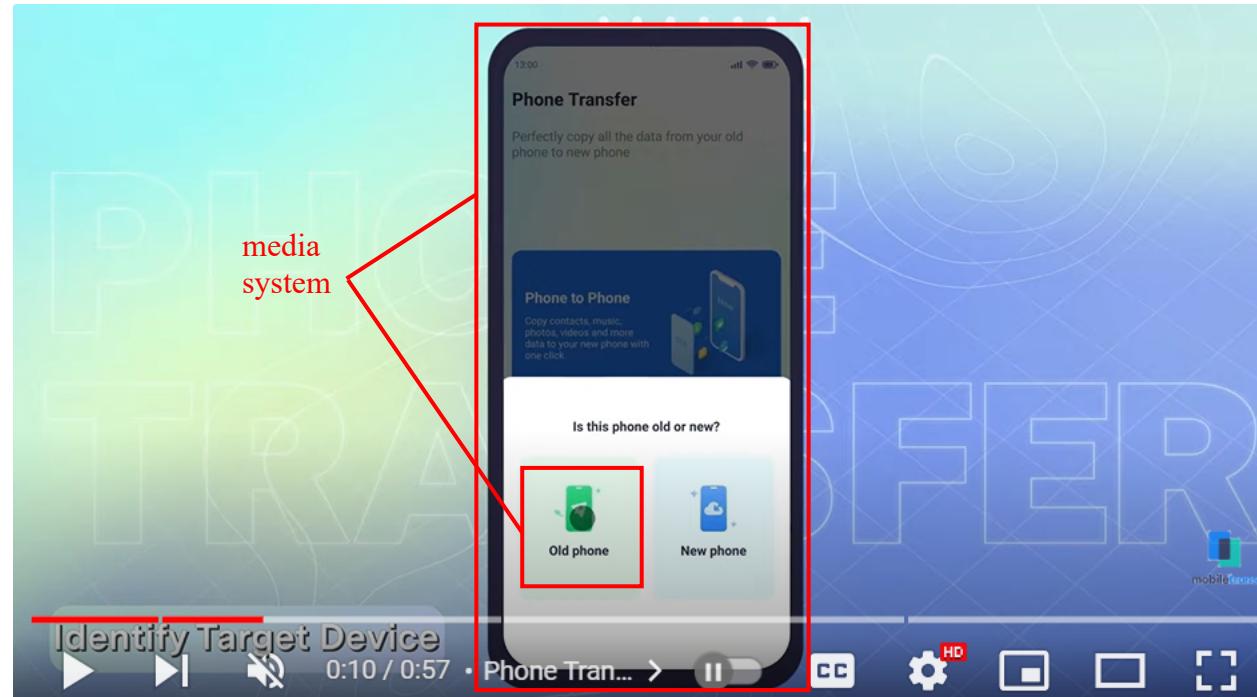
system ,	 <p>The image shows the Wondershare login page. A red box highlights the 'Log in with:' section, which includes Google, Facebook, Twitter, and Apple icons. Below this is a 'or' separator, followed by 'Email address' and 'Password' input fields. A 'Keep me logged in' checkbox is checked. At the bottom is a large blue 'Log in' button. Below the button are links for 'Create account' and 'Forgot your password?'. A red arrow points from the text 'user login to Wondershare account' to the 'Log in' button.</p> <p>user login to Wondershare account</p> <p>Source: https://accounts.wondershare.com/web/login-new?_gl=1%2a1p2a9bm%2a_gcl_au%2aMjAxMzkyNTU2NC4xNzAyODg0MDc3%2a_ga%2aMTEyMjM1MjAwNC4xNzAyODg0MDc5%2a_ga_24WTSJBD5B%2aMTcwMzgzMDY4My42LjAuMTcwMzgzMDY5MS41Mi4wLjA.&_ga=2.259574346.1909711405.1703824421-1122352004.1702884079 (annotated)</p> <p> File Transfer: Easily Transfer Multiple Files</p> <p>Share files from one device with any other. Effortlessly and wirelessly</p> <p>Transfer files across different platforms without the Internet and allows file-sharing nearby and remotely.</p>
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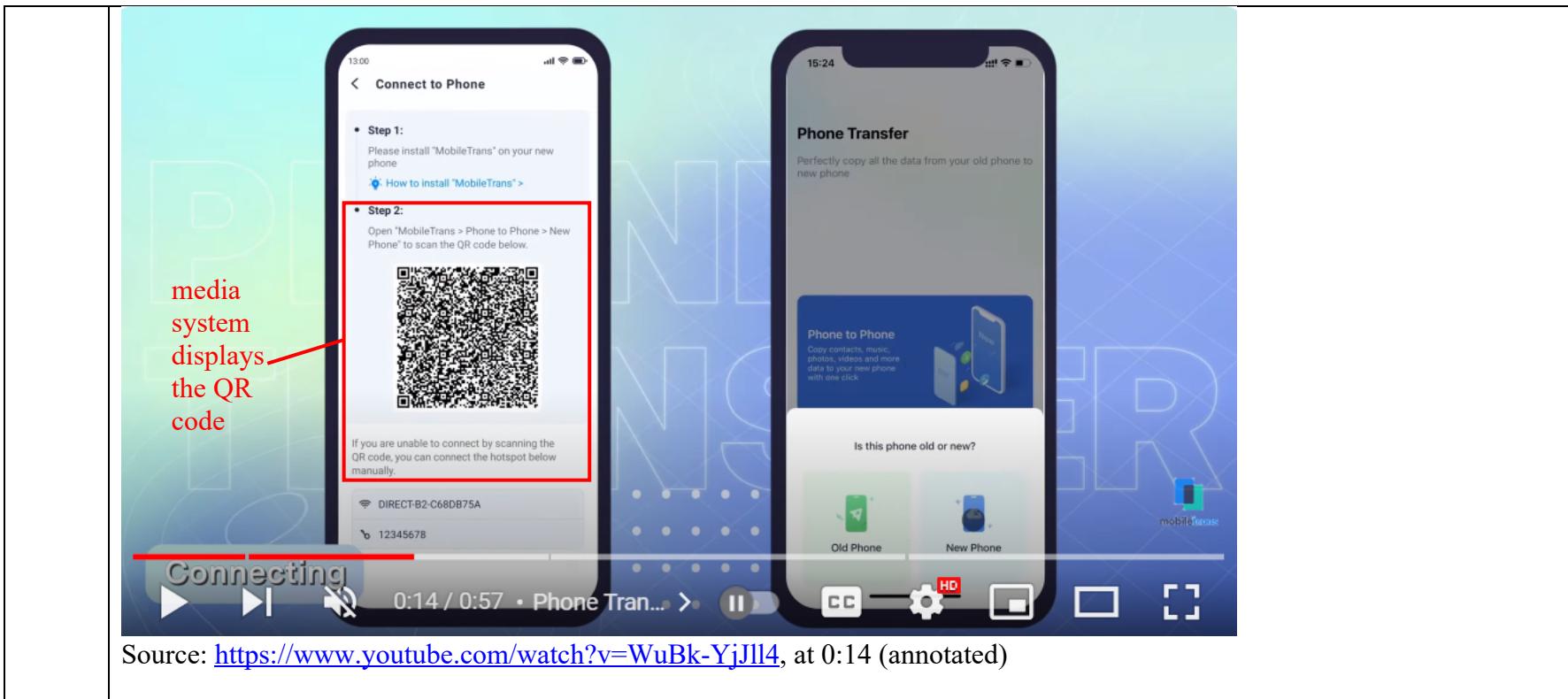


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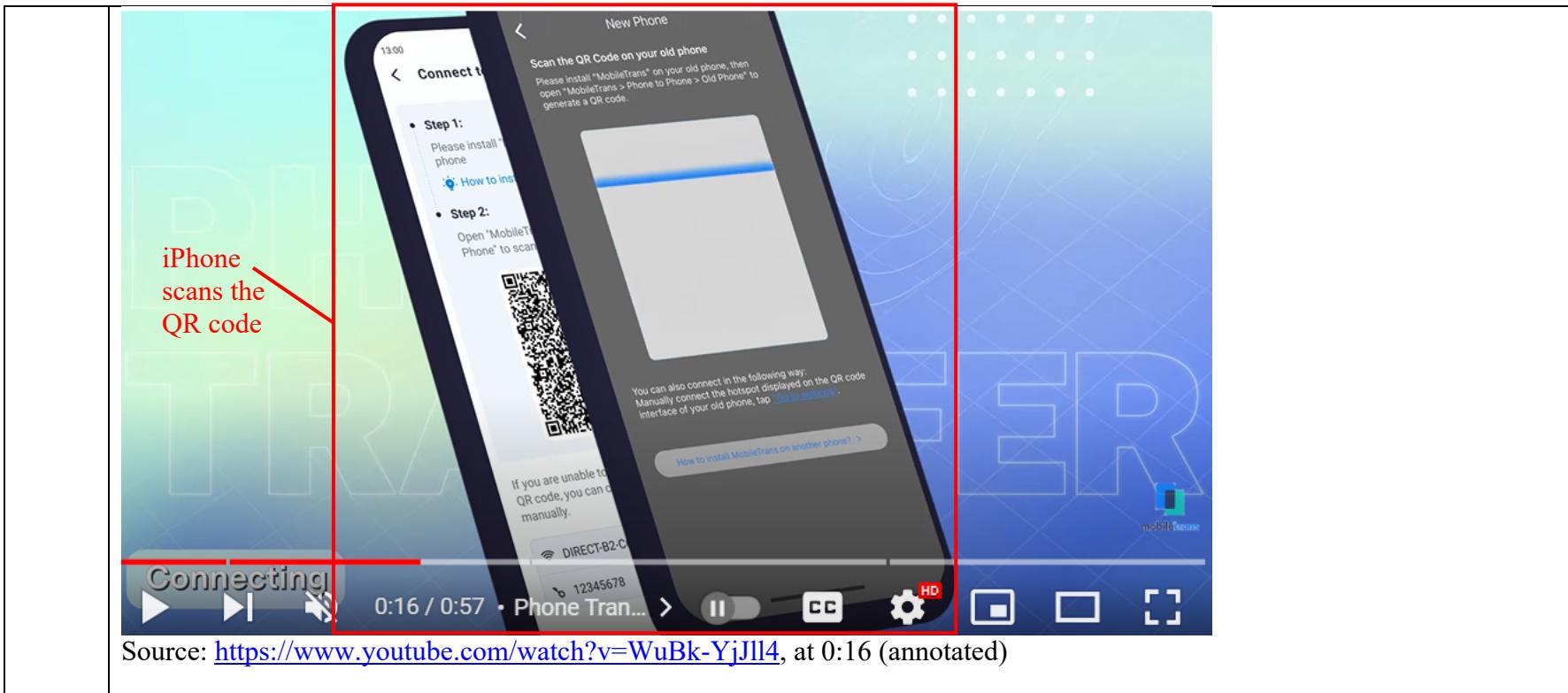


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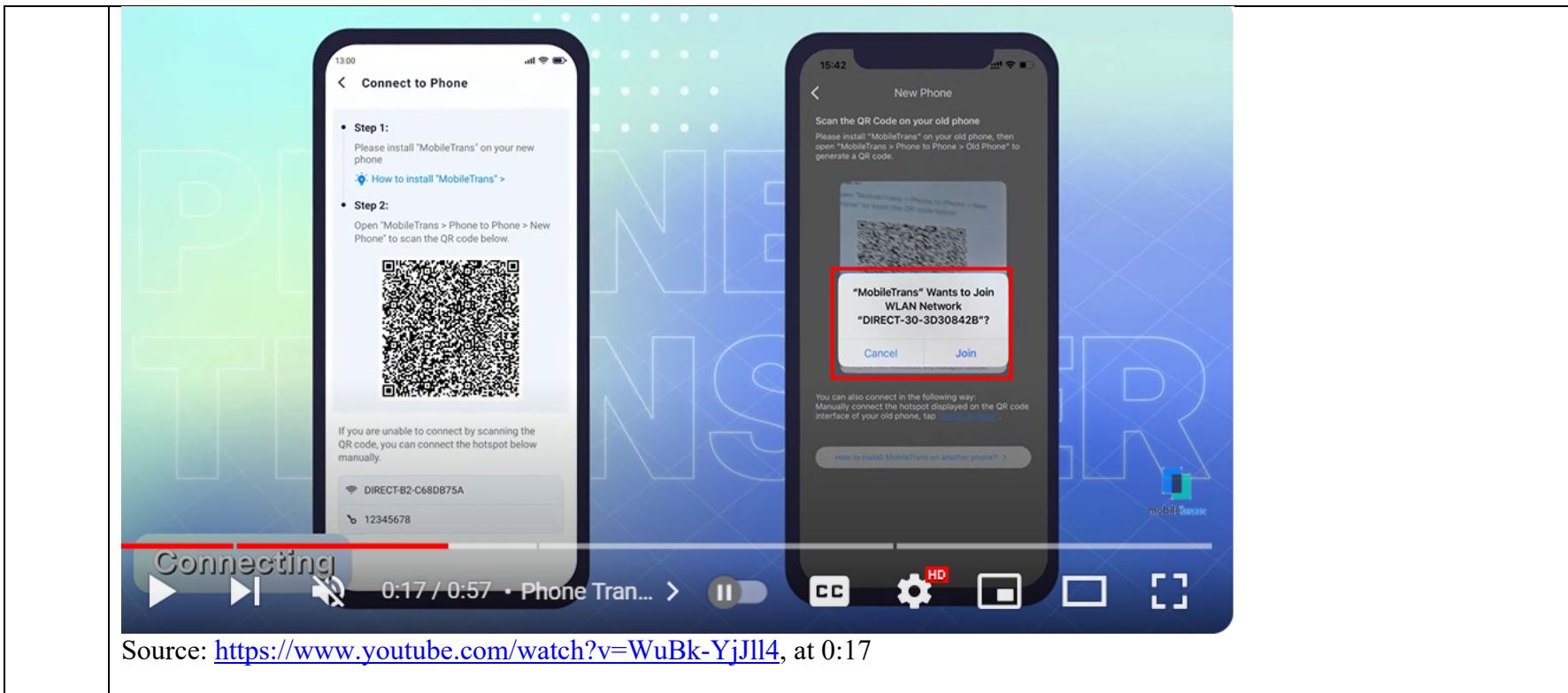


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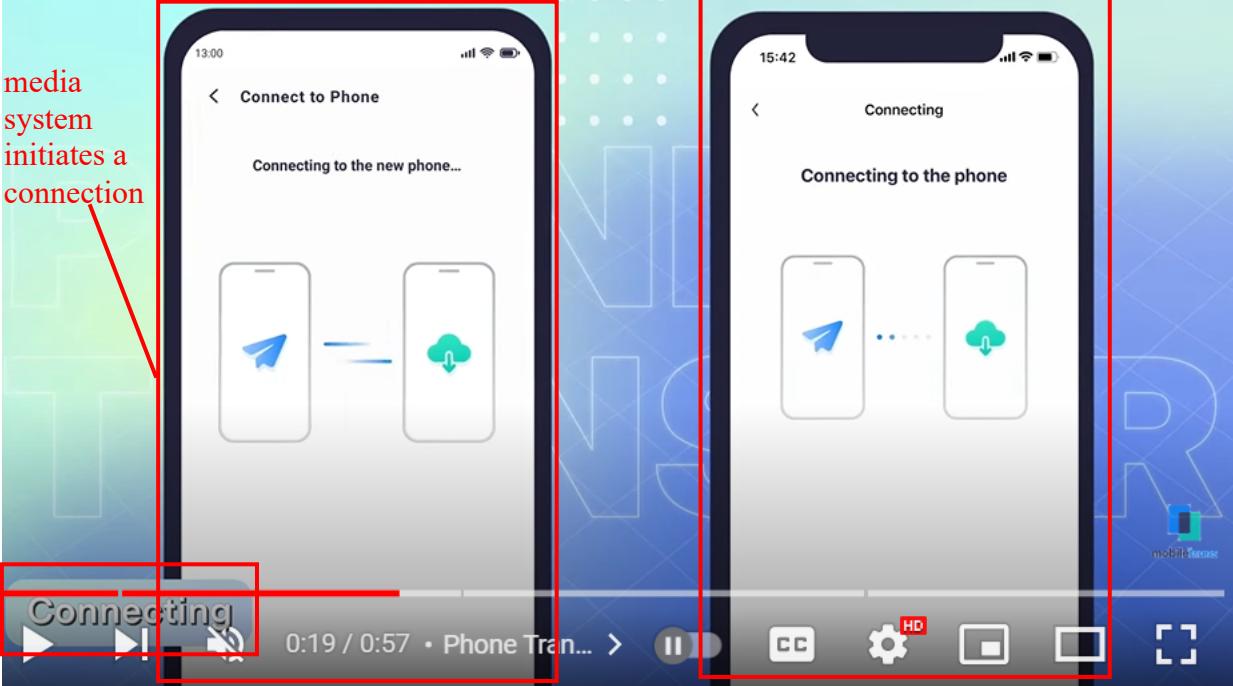
	 <p>media system initiates a connection</p> <p>Source: https://www.youtube.com/watch?v=WuBk-YjJlI4, at 0:19 (annotated)</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
[22.5] transmitting by said wireless mobile device	<p>Company performs and/or induces others to perform the step of transmitting by said wireless mobile device to the media system said at least one digital media file therebetween via said communication link.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, in file transfer feature, the iPhone ("wireless mobile device ") utilizes the established communication channel to send ("transmitting") files ("digital media file") to the iPhone ("media system").</p>

Exhibit B to the Complaint

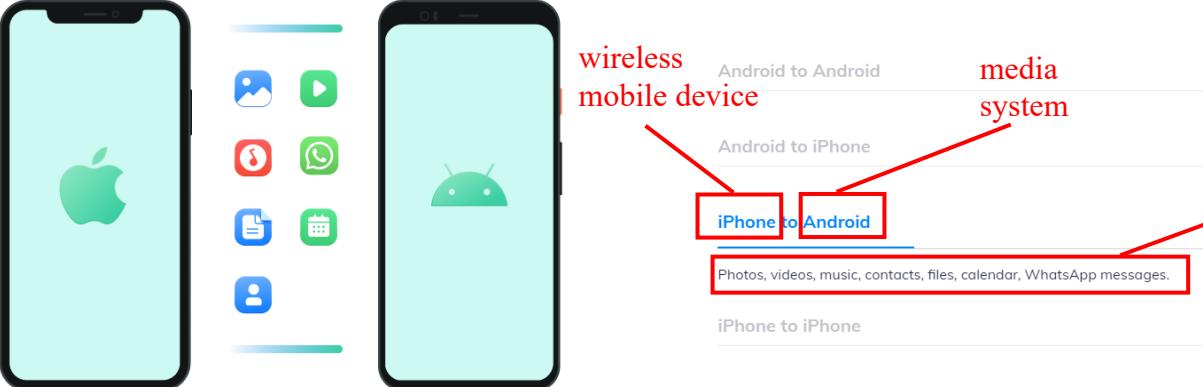
to the media system said at least one digital media file thereb etwee n via said comm unicati on link, and	 <p>Source: https://mobiletrans.wondershare.com/app/phone-to-phone-transfer-app.html (annotated)</p> <p>File Transfer: Easily Transfer Multiple Files</p> <p>Share files from one device with any other. Effortlessly and wirelessly</p> <p>Transfer files across different platforms without the Internet and allows file-sharing nearby and remotely.</p>
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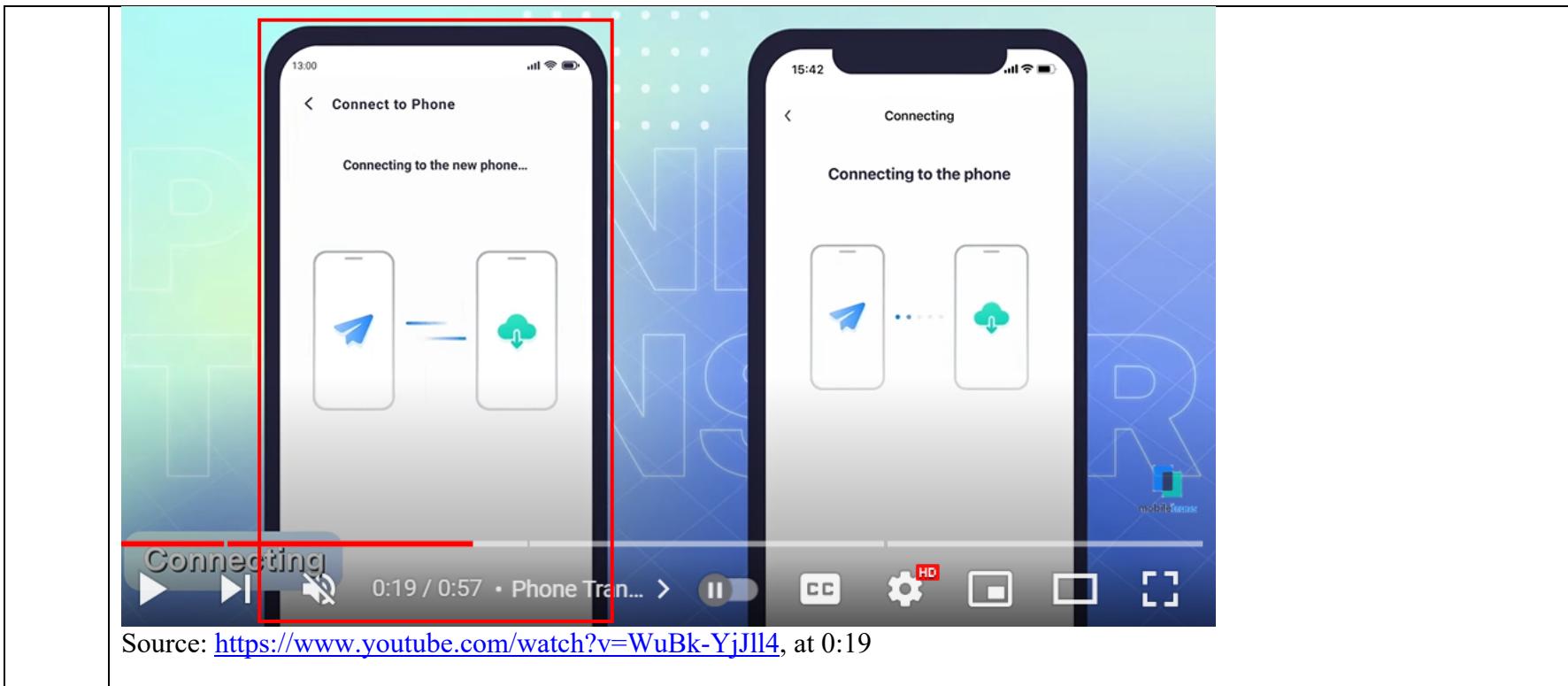


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	<p>Source: https://www.youtube.com/watch?v=WuBk-YjJlI4, at 0:20</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
[22.6] wherein said communication link is structured to bypass the security measure of the media system for a limited permissible use of the communication link by the wireless mobile device for only transferring the at least one digital media file to, and displaying the at least one digital media file on, the media system.	<p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the Android phone and the iPhone do not require users to input the email and the password ("security measure") every time they communicate. Instead, the email and password input are necessary during the initial connection process, and thereafter, the devices automatically exchange data without requiring users to re-enter the email and password. Therefore, upon information and belief, the communication link is structured to bypass the security measure of the media system. Furthermore,</p>

Exhibit B to the Complaint

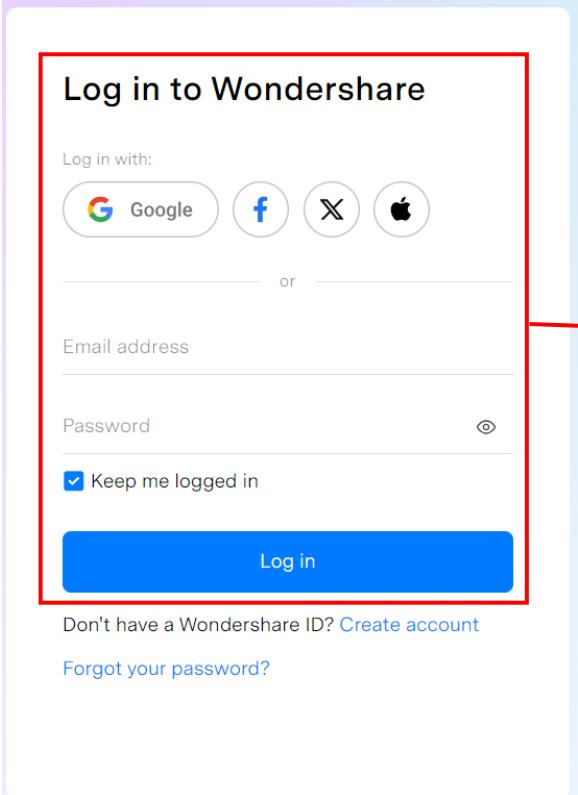
the security measure of the media system for a limited permissible use of the communication link by the wireless mobile device for only transferring the at least one digital media file to,	<p>the iPhone utilizes the communication channel exclusively for transmitting the files to the Android phone (“bypass the security measure of the media system for a limited permissible use of the communication link by the wireless mobile device for only transferring the at least one digital media file”). The Android phone display the files which are received from the iPhone.</p>  <p>media terminal security measure</p> <p>Source: https://accounts.wondershare.com/web/login-new?_gl=1%2a1p2a9bm%2a_gcl_au%2aMjAxMzkyNTU2NC4xNzAyODg0MDc3%2a_ga%2aMTEyMjM1MjAwNC4xNzAyODg0MDc5%2a_ga_24WTSJBD5B%2aMTcwMzgzMDY4My42LjAuMTcwMzgzMDY5MS41Mi4wLjA.&_ga=2.259574346.1909711405.1703824421-1122352004.1702884079 (annotated)</p>
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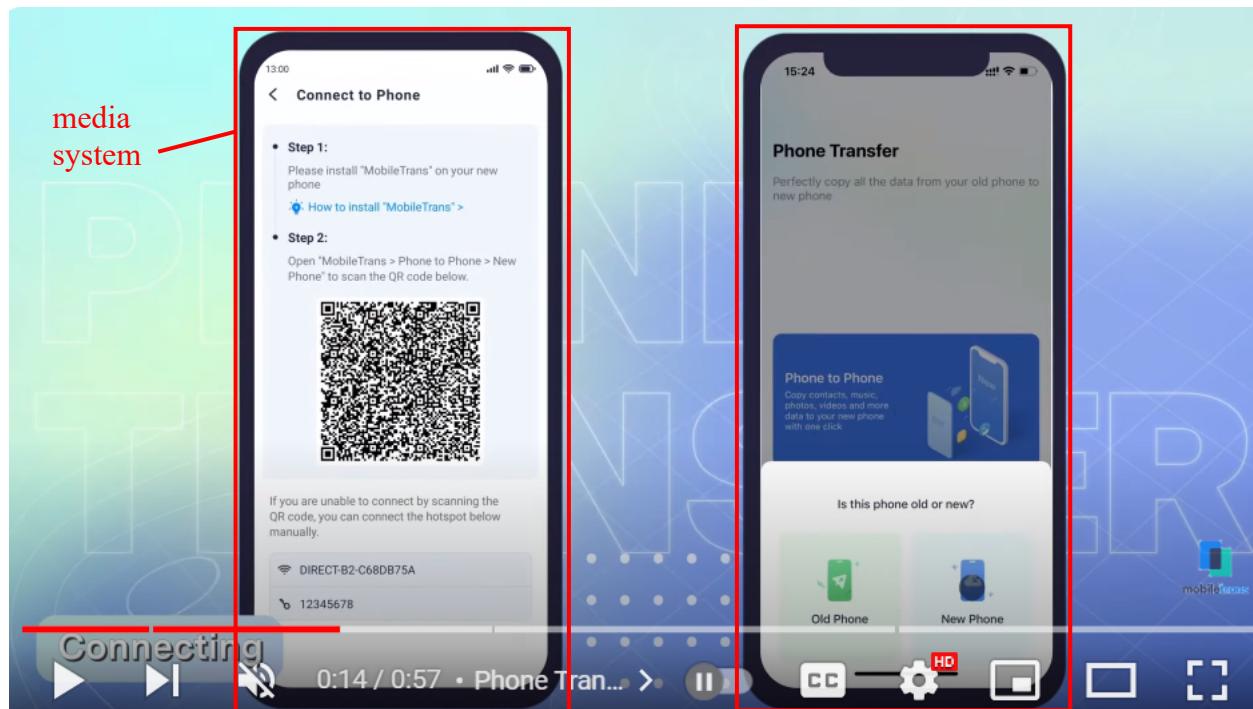
and displaying the at least one digital media file on, the media system.

File Transfer: Easily Transfer Multiple Files

Share files from one device with any other. Effortlessly and wirelessly

Transfer files across different platforms without the Internet and allows file-sharing nearby and remotely.

Source: <https://mobiletrans.wondershare.com/app/phone-to-phone-transfer-app.html>



Source: <https://www.youtube.com/watch?v=WuBk-YjJl4>, at 0:14 (annotated)

Exhibit B to the Complaint



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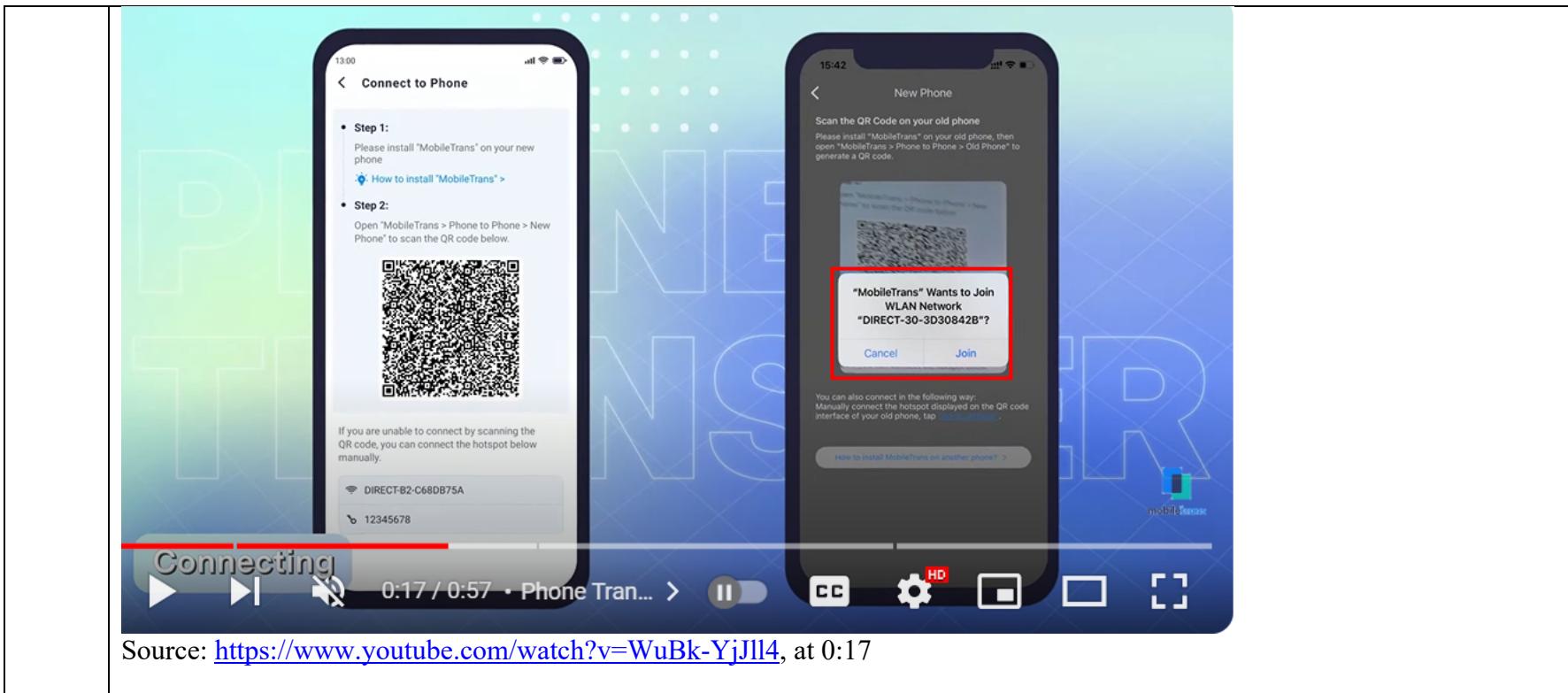


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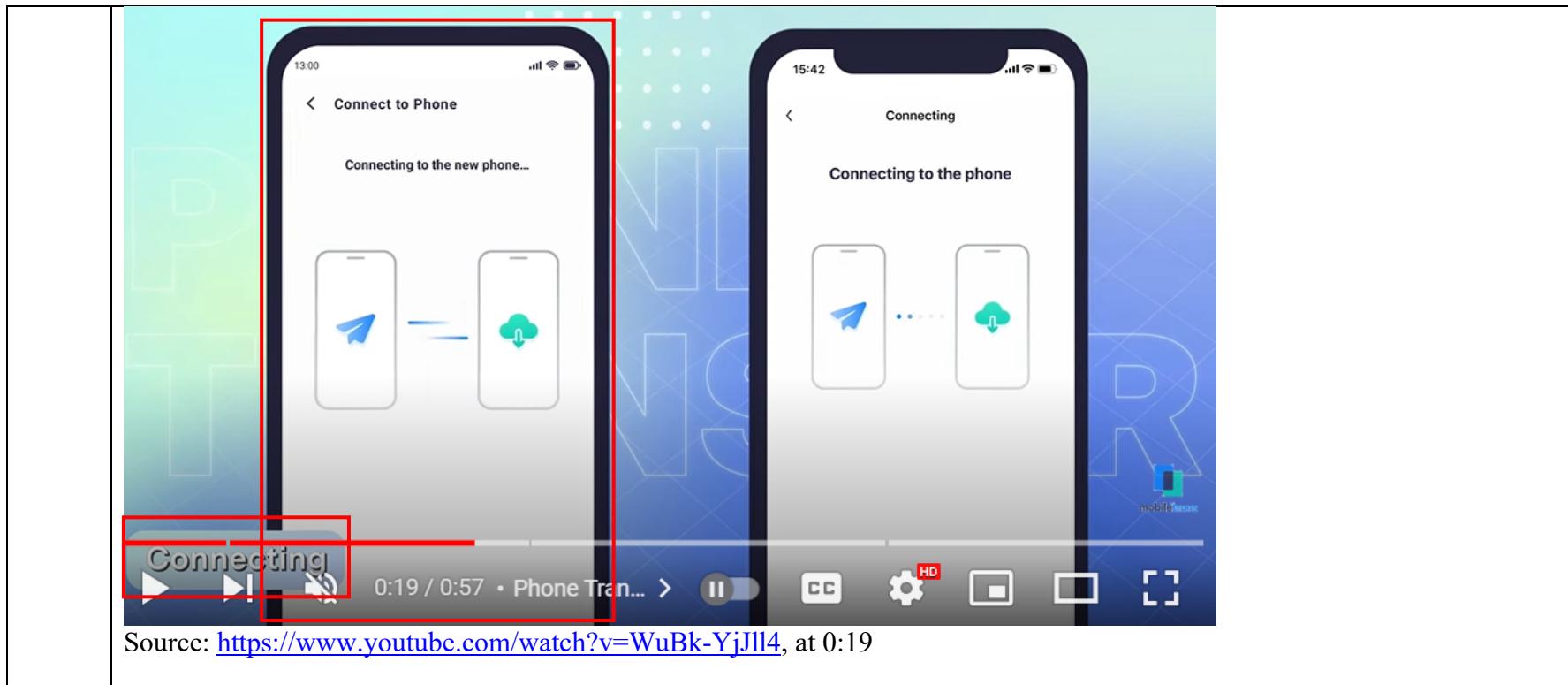


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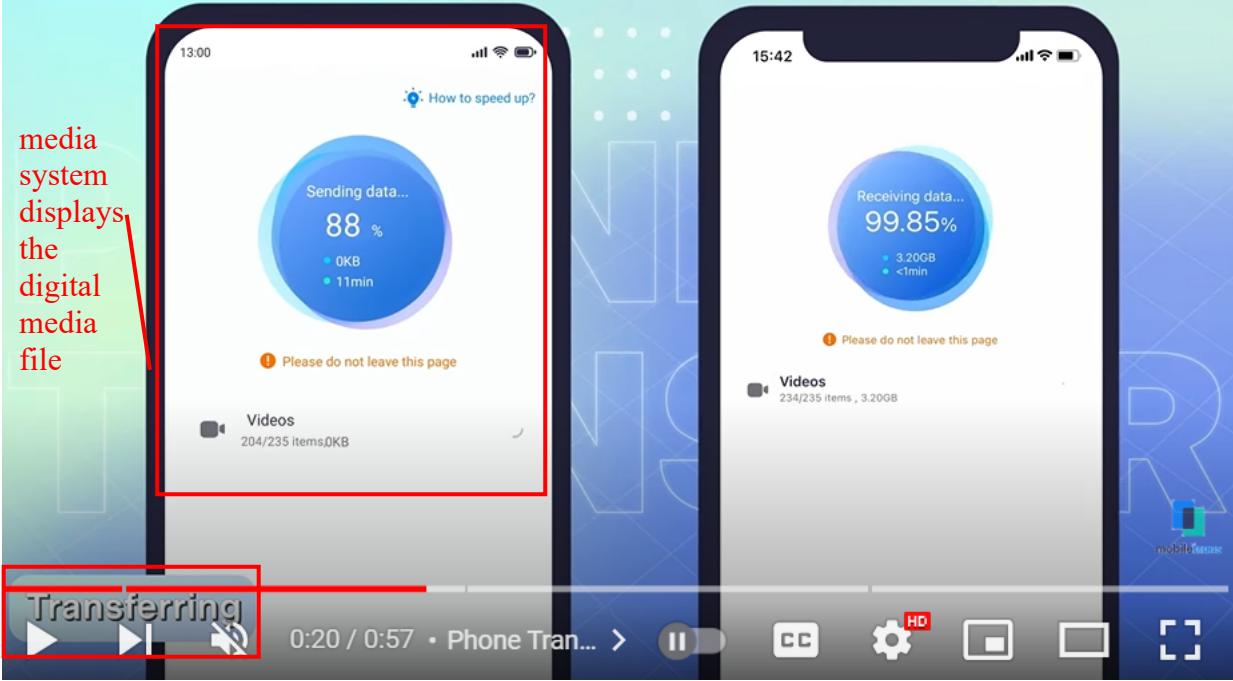
	 <p>media system displays the digital media file</p> <p>Transferring</p>
	<p>Source: https://www.youtube.com/watch?v=WuBk-YjJlI4, at 0:20 (annotated)</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
[24] The method of claim 22, where in the transmission	<p>Company performs and/or induces others to perform the step of transmission of the at least one digital media file from the wireless mobile device to the media system completely bypasses the security measure.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the Android phone and the iPhone do not require users to input the email and the password ("security measure") every time they communicate. Instead, the email and password input are necessary during the initial connection process, and thereafter, the devices automatically exchange data without requiring users to re-enter the email and password. Therefore, upon information and belief, the channel created between the iPhone and the Android phone bypass the security measure.</p>

Exhibit B to the Complaint

of the at least one digital media file from the wireless mobile device to the media system completely bypasses the security measure.	<p>Log in to Wondershare</p> <p>Log in with:</p> <p> Google   </p> <p>or</p> <p>Email address</p> <p>Password </p> <p><input checked="" type="checkbox"/> Keep me logged in</p> <p>Log in</p> <p>Don't have a Wondershare ID? Create account</p> <p>Forgot your password?</p>	<p style="color: red; margin-left: 20px;">media system security measure</p> <p>Source: https://accounts.wondershare.com/web/login-new?_gl=1%2a1p2a9bm%2a_gcl_au%2aMjAxMzkyNTU2NC4xNzAyODg0MDc3%2a_ga%2aMTEyMjM1MjAwNC4xNzAyODg0MDc5%2a_ga_24WTSJBD5B%2aMTcwMzgzMDY4My42LjAuMTcwMzgzMDY5MS41Mi4wLjA.&_ga=2.259574346.1909711405.1703824421-1122352004.1702884079 (annotated)</p>
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Exhibit B to the Complaint



wireless
mobile
device

Android to Android

Android to iPhone

iPhone to Android

iPhone to iPhone

media
system

digital
media file

Source: <https://mobiletrans.wondershare.com/app/phone-to-phone-transfer-app.html> (annotated)

File Transfer: Easily Transfer Multiple Files

Share files from one device with any other. Effortlessly and wirelessly

Transfer files across different platforms without the Internet and allows file-sharing nearby and remotely.

Source: <https://mobiletrans.wondershare.com/app/phone-to-phone-transfer-app.html>

Exhibit B to the Complaint

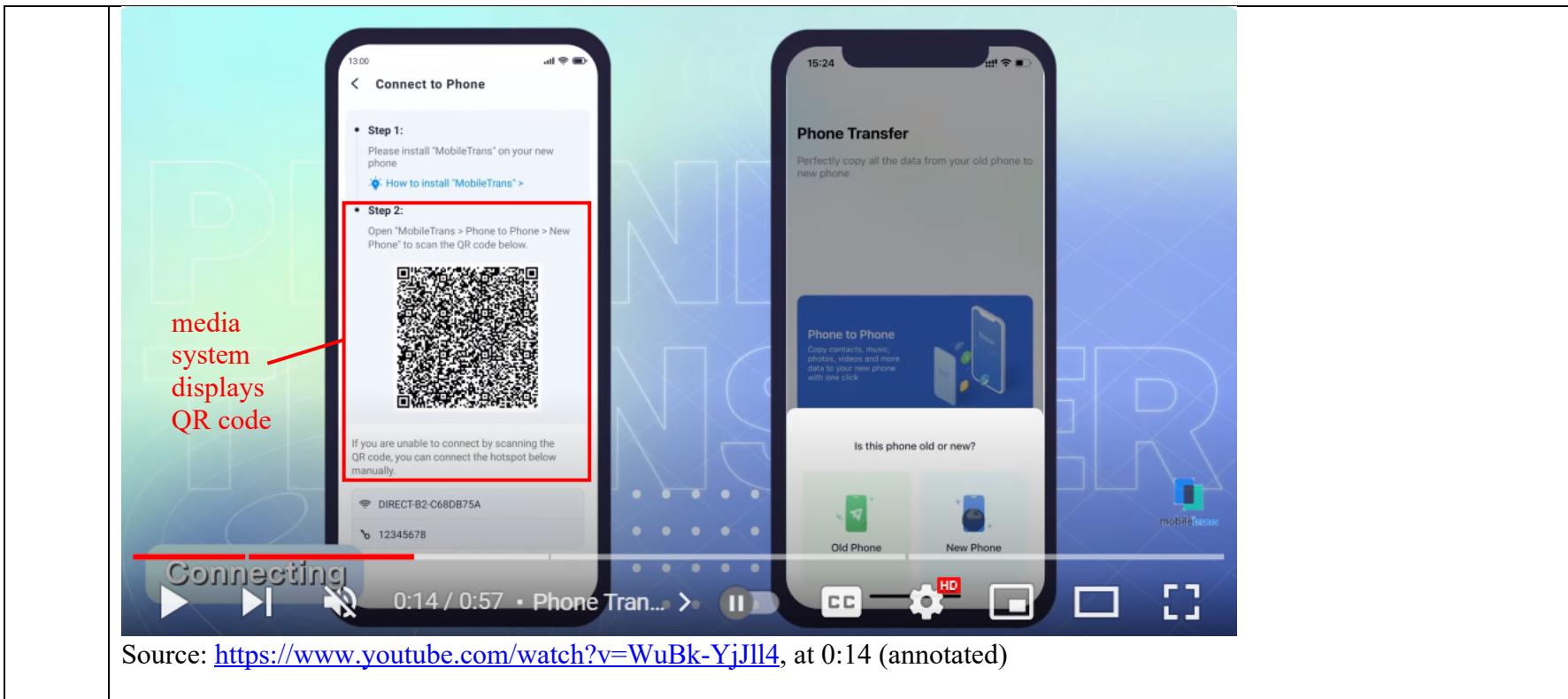


Exhibit B to the Complaint

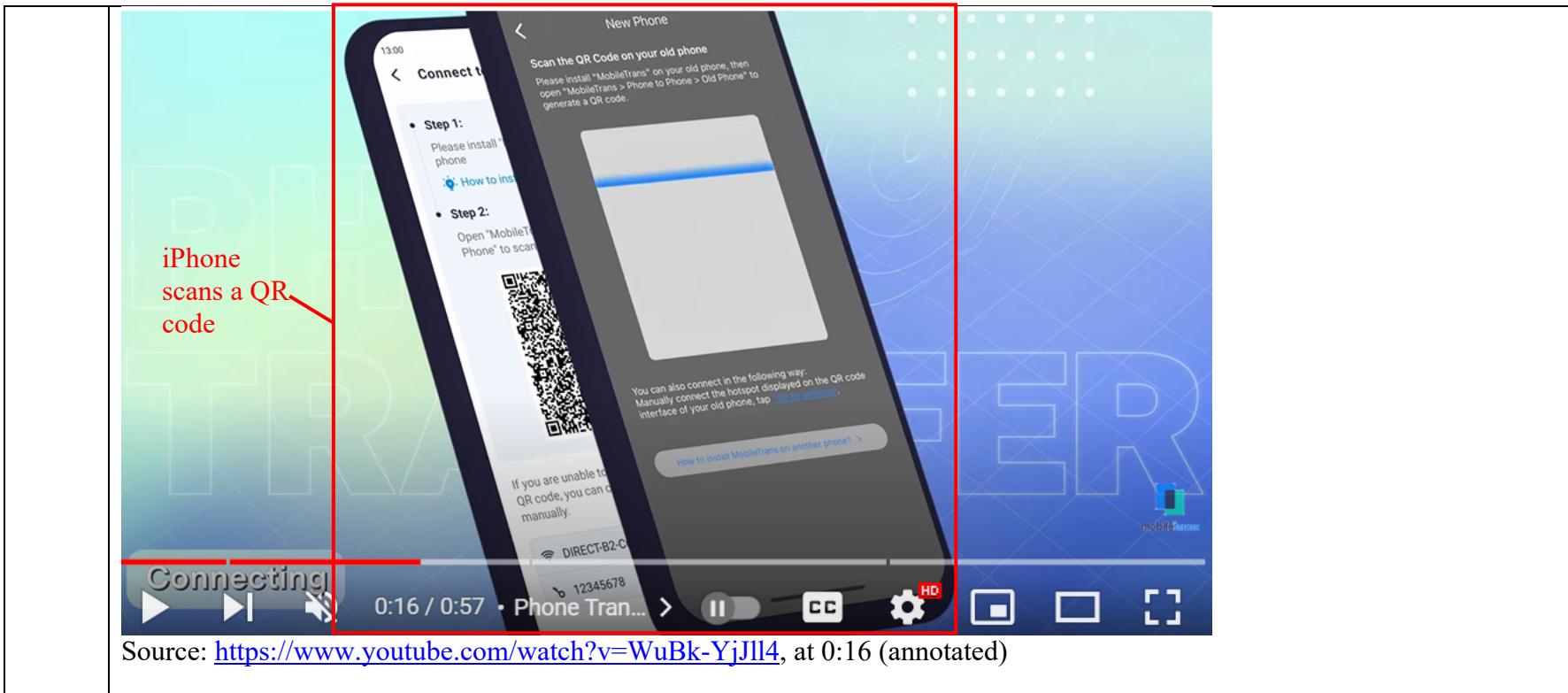


Exhibit B to the Complaint

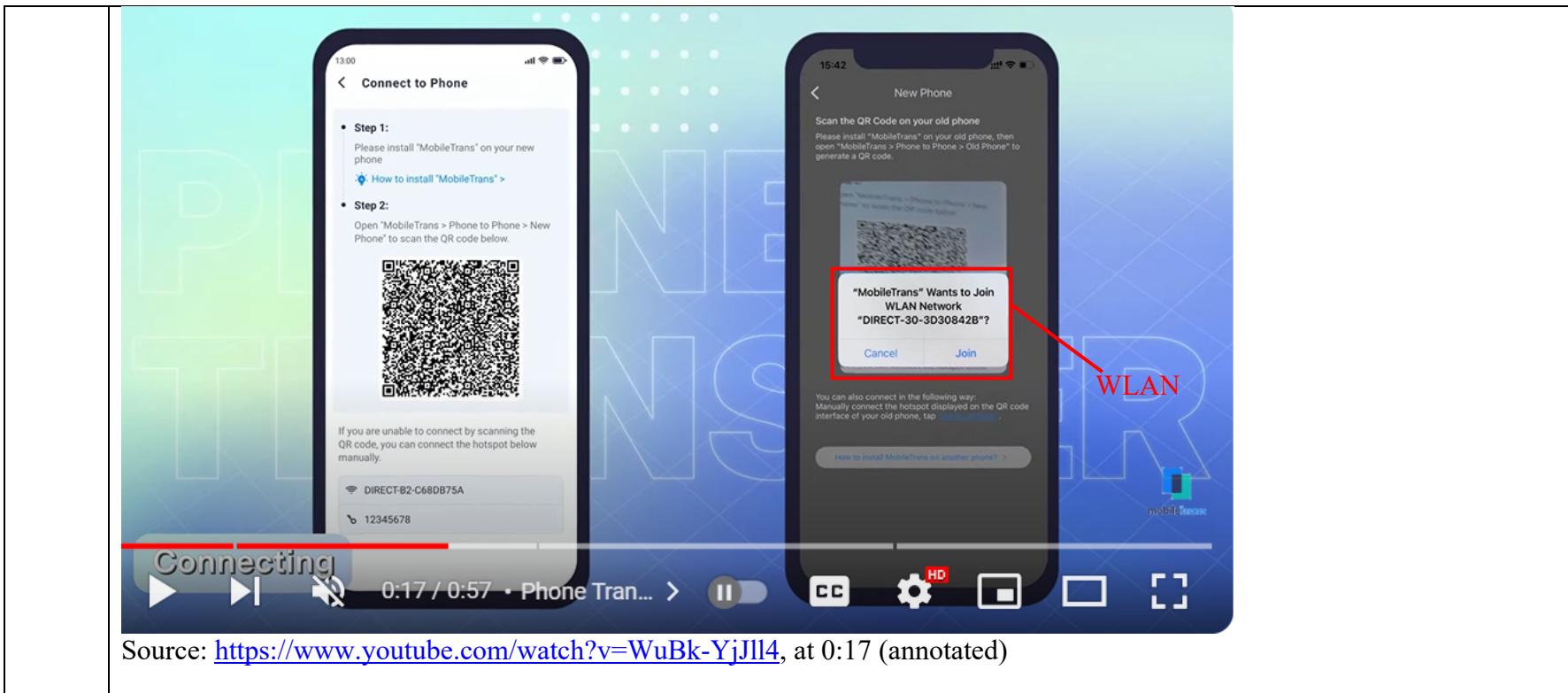


Exhibit B to the Complaint

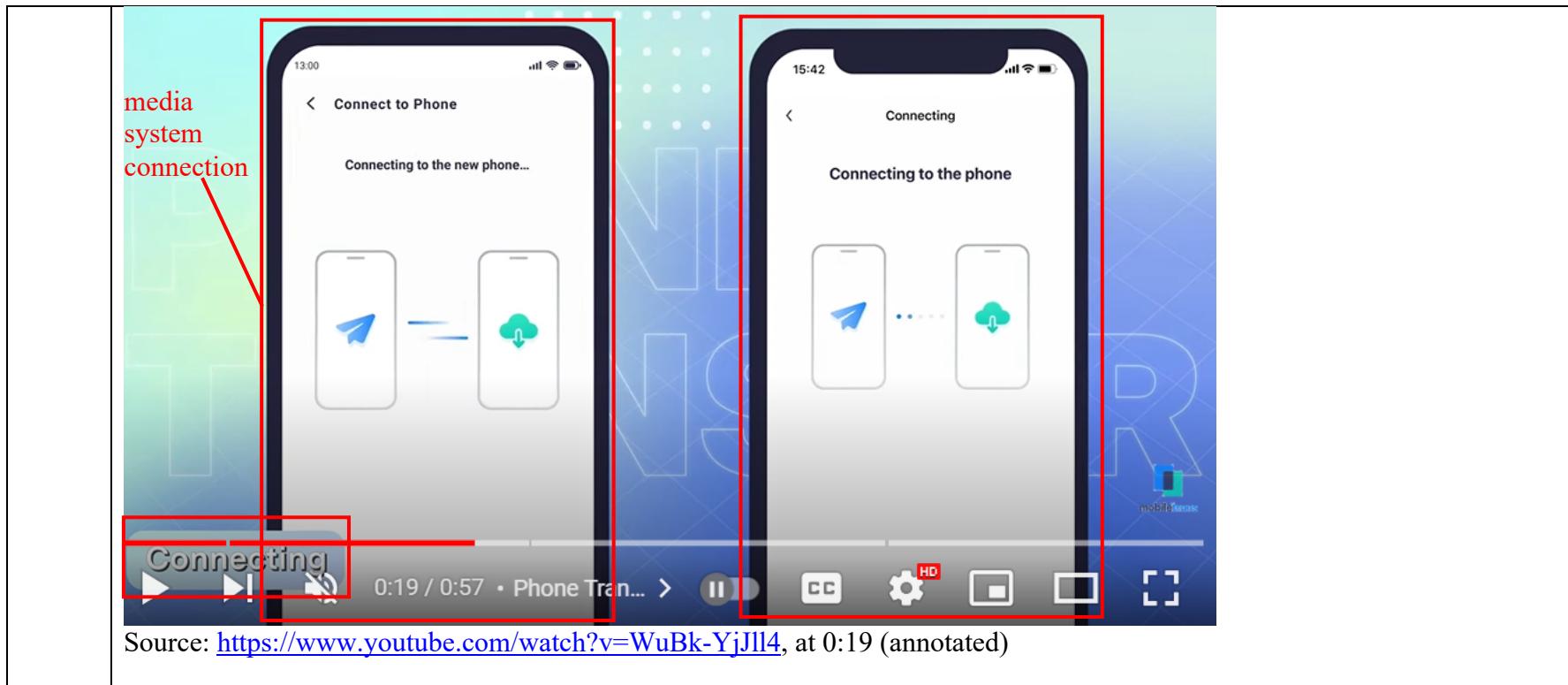


Exhibit B to the Complaint

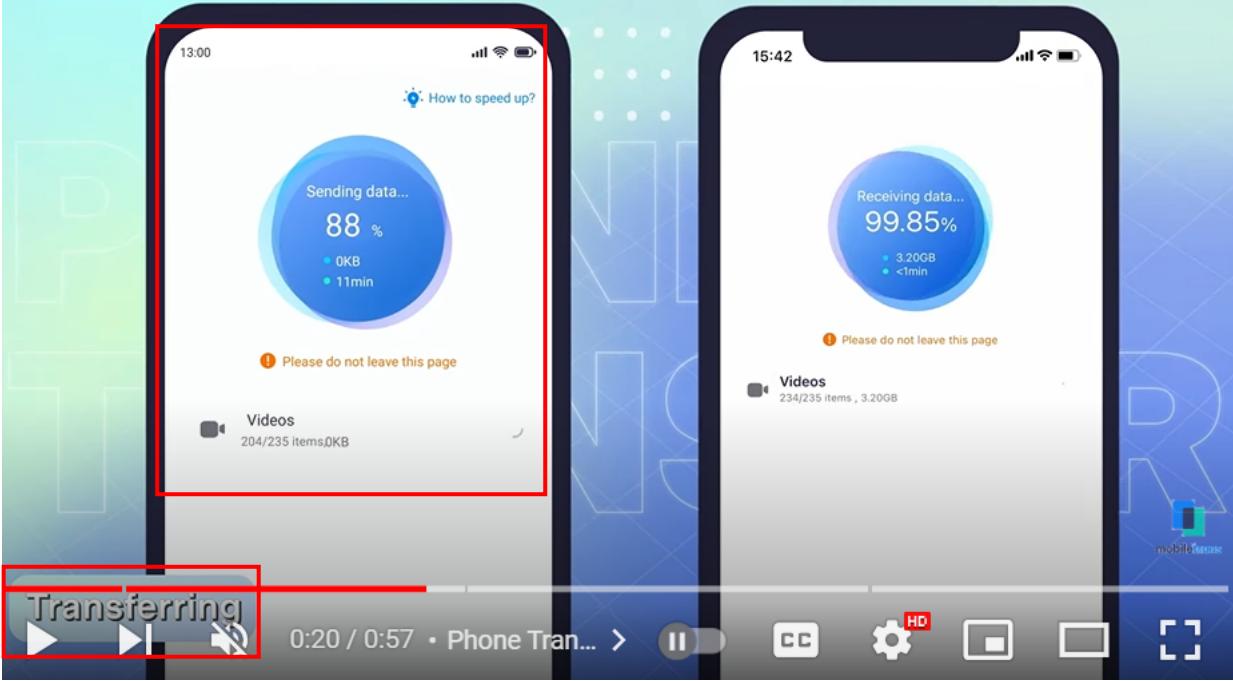
	 <p>Source: https://www.youtube.com/watch?v=WuBk-YjJlI4, at 0:20</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
[27] The method of claim 22, where in the communication	<p>Company performs and/or induces others to perform the step of the communication link is at least one of a peer-to-peer connection, bluetooth connection, and a WiFi connection.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the iPhone transmits the files to the nearby Android phone using the WLAN connection ("WiFi connection").</p>

Exhibit B to the Complaint

on link is at least one of a peer- to- peer conne- ction, bluetoo- th conne- ction, and a WiFi conne- ction.	 <p>Source: https://mobiletrans.wondershare.com/app/phone-to-phone-transfer-app.html</p> <p>File Transfer: Easily Transfer Multiple Files</p> <p>Share files from one device with any other. Effortlessly and wirelessly</p> <p>Transfer files across different platforms without the Internet and allows file-sharing nearby and remotely.</p>
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Exhibit B to the Complaint

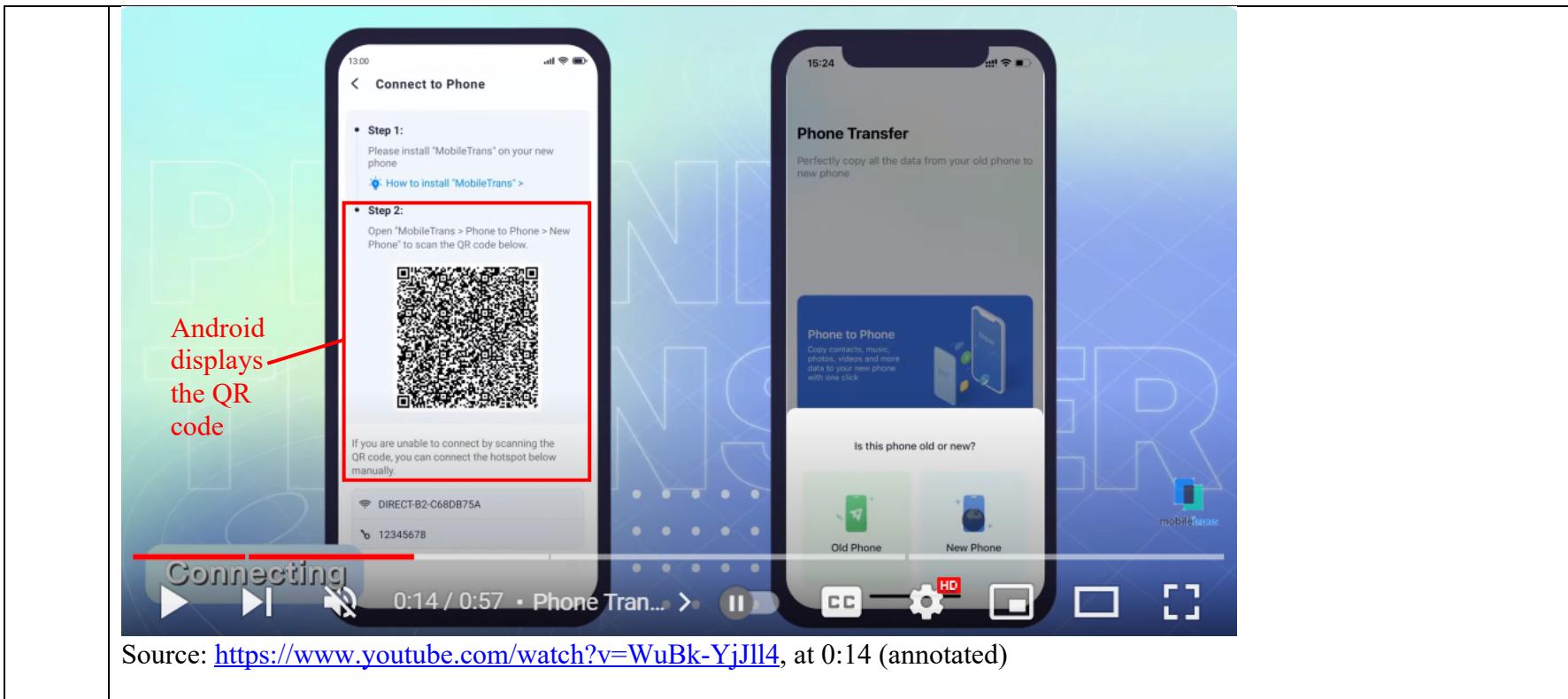
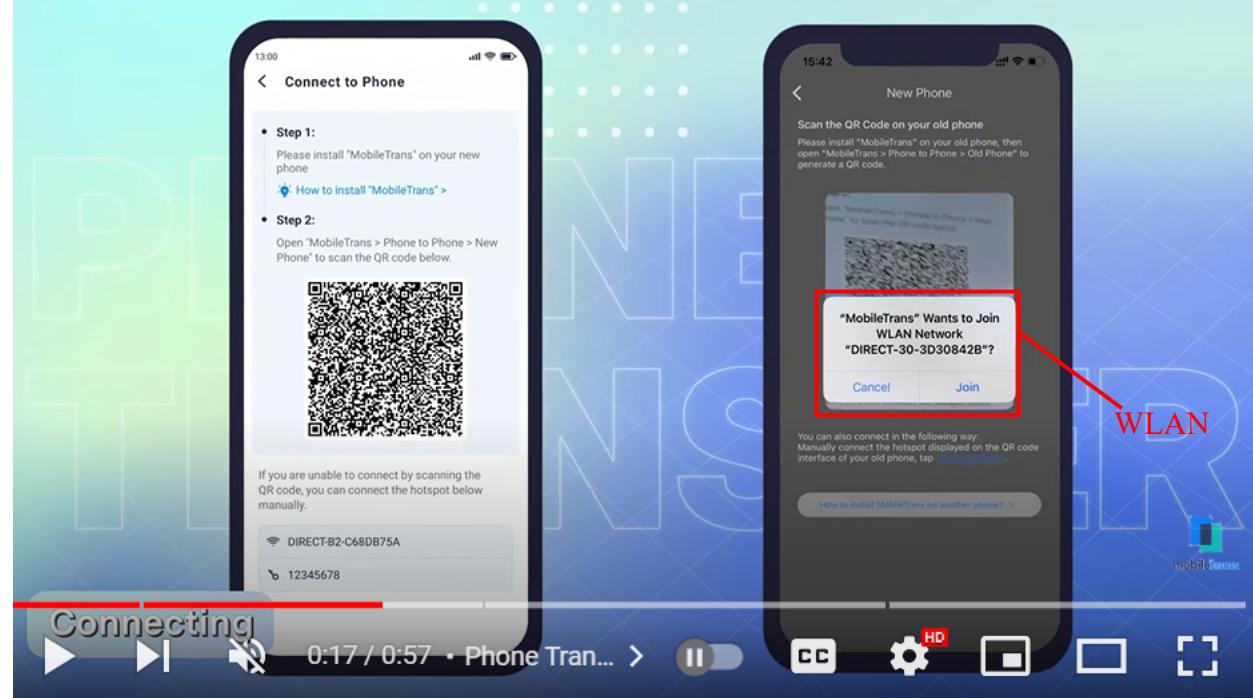


Exhibit B to the Complaint



Exhibit B to the Complaint



Source: <https://www.youtube.com/watch?v=WuBk-YjJlI4>, at 0:17 (annotated)

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.

<p>[29] The metho d of claim 22, further compr ising</p>	<p>Company performs and/or induces others to perform the step of presenting the at least one digital media file on a display. This element is infringed literally, or in the alternative, under the doctrine of equivalents. For example, the Android displays ("presenting") the received files ("digital media file").</p>
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Exhibit B to the Complaint

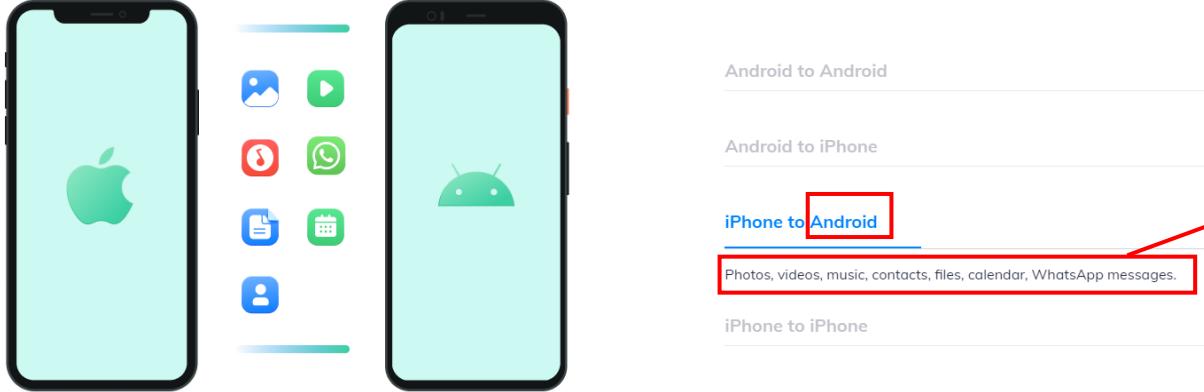
presenting the at least one digital media file on a display.	 <p>Source: https://mobiletrans.wondershare.com/app/phone-to-phone-transfer-app.html (annotated)</p> <p>File Transfer: Easily Transfer Multiple Files</p> <p>Share files from one device with any other. Effortlessly and wirelessly</p> <p>Transfer files across different platforms without the Internet and allows file-sharing nearby and remotely.</p> <p>Source: https://mobiletrans.wondershare.com/app/phone-to-phone-transfer-app.html</p>
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Exhibit B to the Complaint

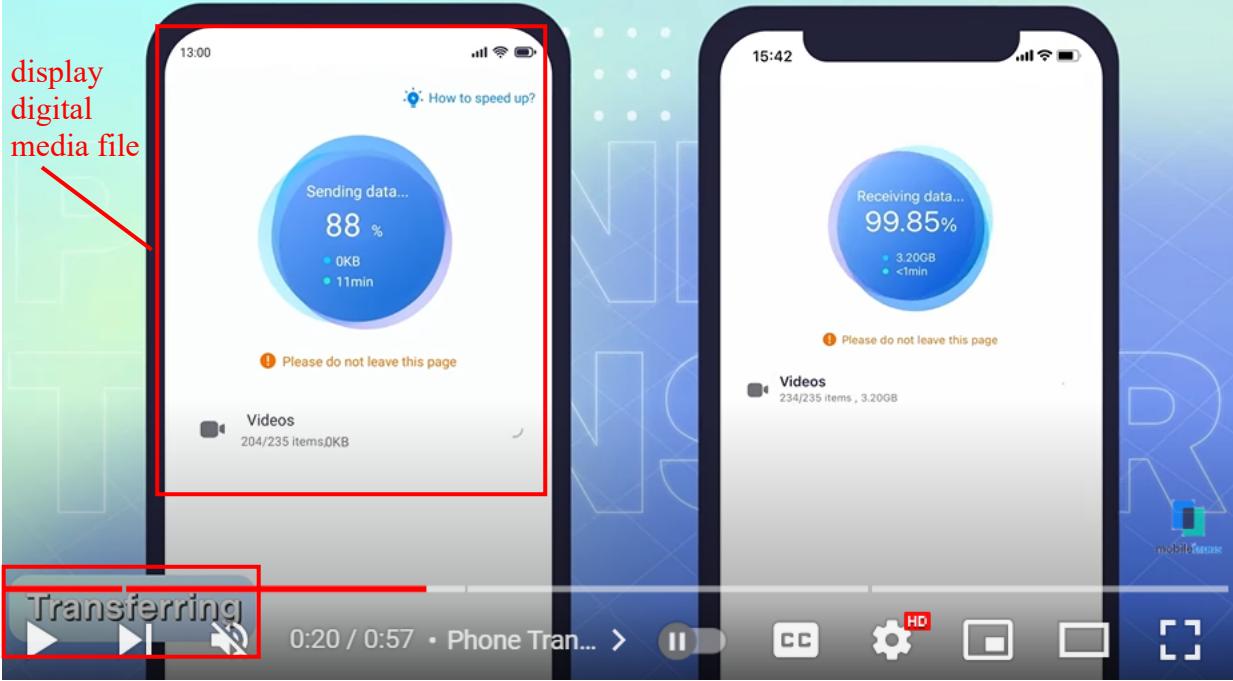
	 <p>display digital media file</p> <p>Transferring</p>
	<p>Source: https://www.youtube.com/watch?v=WuBk-YjJlI4, at 0:20</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
[30] The method of claim 22, where in the at least one	<p>Company performs and/or induces others to perform the step of at least one digital media file is provided by the wireless mobile device.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the iPhone ("wireless mobile device") transmits the files ("at least one digital media file") to the Android phone.</p>

Exhibit B to the Complaint

<p>digital media file is provided by the wireless mobile device .</p>	 <p>Source: https://mobiletrans.wondershare.com/app/phone-to-phone-transfer-app.html (annotated)</p>	<p>Android to Android Android to iPhone iPhone to iPhone</p> <p>wireless mobile device</p> <p>iPhone to Android</p> <p>Photos, videos, music, contacts, files, calendar, WhatsApp messages.</p> <p>digital media file</p>
		<p>Share files from one device with any other. Effortlessly and wirelessly</p> <p>Transfer files across different platforms without the Internet and allows file-sharing nearby and remotely.</p> <p>Source: https://mobiletrans.wondershare.com/app/phone-to-phone-transfer-app.html</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>

Exhibit B to the Complaint

2. List of References

1. <https://mobiletrans.wondershare.com/app/phone-to-phone-transfer-app.html>, last accessed on December 29, 2023.
2. https://accounts.wondershare.com/web/login-new?_gl=1%2a1p2a9bm%2a_gcl_au%2aMjAxMzkyNTU2NC4xNzAyODg0MDc3%2a_ga%2aMTEyMjM1MjAwNC4xNzAyODg0MDc5%2a_ga_24WTSJBD5B%2aMTcwMzgzMDY4My42LjAuMTcwMzgzMDY5MS41Mi4wLjA.&_ga=2.259574346.1909711405.1703824421-1122352004.1702884079, last accessed on December 29, 2023.
3. <https://www.youtube.com/watch?v=WuBk-YjJI4>, last accessed on December 29, 2023.
4. <https://mobiletrans.wondershare.com/phone-to-phone-transfer.html>, last accessed on December 29, 2023.
5. <https://mobiletrans.wondershare.com>, last accessed on December 29, 2023.